

**Exhibit A**

**Detailed Statement of Hours and Fees**

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

For professional services for the period ending 31 October 2023

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
<b>Asset Analysis, Sale &amp; Disposition</b>				
1 October 2023	Review of sale process update from Jefferies (0.3) and related provisions of sale agreement (0.8).	G Pryor	1.10	2,145.00
2 October 2023	Emails to F. He (W&C) re: US Trustee inquiry re: LAS bid (0.2); email to R. Meisler (Skadden) and J. Madden (Skadden) re: LAS bid issues (0.1).	D Turetsky	0.30	525.00
2 October 2023	Review of ancillary sale documents (0.4); correspond with S. Zhang re: same (0.1).	A Cieply	0.50	730.00
2 October 2023	Review US Trustee questions re: sale and research re: same (0.5); confer with D. Turetsky re: same (0.3); confer with buyer counsel re: same (0.2).	F He	1.00	1,310.00
2 October 2023	Correspond to K. Lisanti re: disclosure schedule to APA re: contracts (0.2); correspond to A. Crnkovich, Silverman team, and company re: contract issues re: Sale to LAS Capital (0.2); correspond to J. Madden re: contract issues (0.2); review correspondence from LAS Capital re: same (0.2).	R Szuba	0.80	912.00
2 October 2023	Correspond with A. Cieply re: ancillary documents (0.1); send IP Assignment Agreement and correspond with J. Al-Buainain (0.3); correspond with A. Cieply and Lordstown re: social media handles in connection with sale (0.2); prepare closing checklist (3.6) and send to N. Bascom for review (0.2); revise bill of sale based on changes to asset purchase agreement (0.7) and send to Skadden (0.2); update MPQ (0.1) and follow up with A. Cieply (0.1) re: same; update (0.2) and send IP Assignment Agreement to Skadden (0.1); follow up with N. Bascom re: closing checklist (0.1).	S Zhang	5.90	4,897.00
3 October 2023	Call with K. Lisanti (Jefferies) re: sale process issues.	D Turetsky	0.10	175.00
3 October 2023	Review and revise Jefferies declaration in support of sale.	R Kampfner	0.80	1,272.00
3 October 2023	Correspondence with Lordstown re: APA terms.	A Cieply	0.70	1,022.00
3 October 2023	Review material for sale inquiries from buyer (0.5); confer with M. Leonard re: sale issues (0.1); call with vendor re: sale issues (0.5); prepare response to US Trustee comments to sale (0.6); confer with landlord re: sale inquires (0.3); confer with buyer re: various sale related issues (0.5); confer with A. Kroll re: vendor inquiry re: sale (0.2); confer with vendor re: same (0.1); confer with A. Steele re: NHTSA question on sale (0.1); confer with A. Cieply re: sale issues (0.2); confer with buyer counsel re: various issues (0.6).	F He	3.70	4,847.00

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3 October 2023	Correspond with F. He re: disclosure schedule (0.1); call with N. Bascom and update checklist (0.7); correspond with Jefferies re: NDA joinder (0.2).	S Zhang	1.00	830.00
4 October 2023	Call with Skadden (R. Meisler, J. Madden) and W&C (R. Kampfner and F. He) re: LAS sale issues (0.4); call with D. Baddley (SEC) re: Lordstown sale issues (0.1); email to D. Baddley (SEC) re: sale issues (0.1); further analysis re: issues re: Workhorse sale objection (0.2).	D Turetsky	0.80	1,400.00
4 October 2023	Correspondence with W&C team re: APA terms.	A Cieply	0.10	146.00
4 October 2023	Prepare response to US Trustee question re: sale to LAS (0.4); confer with A. Crnkovich (Silverman) re: sale diligence issues (0.4); confer with buyer counsel re: same (0.6); call with buyer counsel and R. Kampfner and D. Turetsky (W&C) re: various sale issues (0.4); call with D. Bell, M. Leonard (Company) and R. Szuba (W&C) re: contracts re: sale (0.5); confer with vendor re: sale issues (0.3); confer with A. Kroll (Company) re: same (0.2); confer with landlord re: sale issues (0.2); confer with S. Kohler (Silverman) re: miscellaneous asset sale issues (0.3); confer with D. Turetsky re: same (0.3); confer with Creditors' Committee re: sale related issues (0.2).	F He	3.80	4,978.00
5 October 2023	Review of ancillary sale documents (0.2); correspondence re: compliance with operating APA covenants (0.1).	A Cieply	0.30	438.00
5 October 2023	Confer with A. Kroll and M. Port (Company) re: various sale issues (0.6); confer with buyer counsel re: sale objection issues (0.1); research re: various vendor issues relating to sale (0.3); confer with vendor re: same (0.3); prepare responses to sale objection (0.6); confer with C. Tsitsis (Silverman) re: sale issues (0.4); confer with landlord re: sale objection (0.2); confer with P. Strom re: drafting sale reply (0.2); review material (0.3) and prepare email memo (0.4) to J. Zakia re: sale objection by vendor; review document request from buyer (0.2); confer with A. Crnkovich re: same (0.2).	F He	3.80	4,978.00
5 October 2023	Coordinate review of IP Assignment Agreement with J. Al-Buainain.	S Zhang	0.10	83.00
6 October 2023	Call with M. Leonard (Lordstown), F. He (W&C) and J. Zakia (W&C) re: Workhorse sale objection (0.2); call with Jefferies (S. Costello, R. Hamilton, K. Pasekoff), A. Kroll (Lordstown), A. Cieply (W&C) and others re: sale issues (0.3).	D Turetsky	0.50	875.00
6 October 2023	Confer with client re: sale objections.	J Zakia	0.20	350.00
6 October 2023	Update call re: sales process with Jefferies (S. Costello, R. Hamilton, K. Pasekoff), A. Kroll (Lordstown), D. Turetsky (W&C), and others.	A Cieply	0.30	438.00
6 October 2023	Call with M. Leonard (Company), J. Zakia and D. Turetsky (W&C) re: vendor sale objection issues (0.2);	F He	2.30	3,013.00

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	confer landlord re: sale issues (0.3); calls (0.7) and emails (0.4) with buyer counsel re: various sale objection issues and sale documents; confer with A. Crnkovich (Silverman) re: document request from buyer (0.3); update sale objection tracker (0.2); confer with vendor re: sale objection issues (0.2).			
6 October 2023	Conduct legal research re: reply to sale objections.	P Strom	1.20	1,152.00
6 October 2023	Review bill of sale (0.4) and assignment and assumption agreement (0.4); correspond with N. Bascom for comments (0.1).	S Zhang	0.90	747.00
9 October 2023	Emails to F. He (W&C), D. Kim (W&C) and R. Szuba (W&C) re: evidence to support sale to LAS (0.1); call with R. Bennett (K&E) re: Workhorse sale objection (0.2); further analysis re: issues re: Workhorse sale objection (0.2); call with J. Madden (Skadden) re: Workhorse sale objection (0.1).	D Turetsky	0.60	1,050.00
9 October 2023	Confer with vendor re: sale objection issues (0.2); confer with buyer counsel re: sale objection issues (0.6); confer with C. Tsitsis (Silverman) re: vendor issues relating sale (0.2); confer with landlord re: sale issues (0.3); confer with J. Zakia re: sale related vendor issues (0.4); confer with M. Leonard re: sale document request (0.2); research re: document request (0.3) and email to buyer re: same (0.2); further confer with S. Kohler (Silverman), M. Leonard, A. Kroll and M. Port (Company) re: various business and vendor issues (0.3).	F He	2.70	3,537.00
9 October 2023	Further review revised Finger declaration in support of proposed sale (0.3); review and provide comments to draft reply in support of proposed sale (0.4); correspond with F. He, P. Strom re: same (0.2).	D Kim	0.90	1,143.00
9 October 2023	Further draft reply in support of sale motion (2.7); conduct legal research re: same (0.8).	P Strom	3.50	3,360.00
9 October 2023	Correspond with N. Bascom re: call to discuss closing deliverables (0.1); correspond with T. Akkoyun re: Bill of Sale and Assignment and Assumption Agreement (0.2).	S Zhang	0.30	249.00
10 October 2023	Email to J. Madden (Skadden) re: Workhorse sale objection (0.1); further analysis re: issues re: Workhorse sale objection (0.2); review and comment re: draft proposed order language re: Workhorse sale issues (0.1).	D Turetsky	0.40	700.00
10 October 2023	Review sale order resolution language (0.4); revise draft of sale reply (2.9); confer with F. He re: sale objection (0.2).	R Kampfner	3.50	5,565.00
10 October 2023	Confer with S. Kaul and J. Zakia re: sale objection issues (0.5); confer with NHTSA re: sale objection (0.5); calls and emails with buyer re: same (0.5); draft proposed language for sale order to resolve objection	F He	2.80	3,668.00

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	(0.5); confer with buyer counsel re: same (0.2); revise sale order (0.6).			
10 October 2023	Further revise draft reply in support of proposed sale.	D Kim	0.30	381.00
10 October 2023	Emails with J. Zakia and F. He re: Workhorse sale objection (0.2); analyze Workhorse sale objection (0.6) and related correspondence with Debtors (0.9); draft 30(b)(6) deposition notice to Workhorse (1.6).	S Kaul	3.30	3,498.00
10 October 2023	Review and revise draft reply to sale motion objections.	P Strom	0.50	480.00
10 October 2023	Correspond with T. Akkoyun and A. Cieply re: ancillary sale documents.	S Zhang	0.40	332.00
11 October 2023	Email to J. Madden (Skadden) re: sale issues (0.2); call with R. Bennett (K&E) re: Workhorse objections (0.2); call with R. Meisler (Skadden) re: LAS sale issues (0.3); draft revised language re: Workhorse sale objection (0.1); call with J. Madden (Skadden) re: LAS sale issues (0.2); further call with R. Meisler (Skadden) and J. Madden (Skadden) re: LAS sale issues (0.2); email to R. Bennett (K&E) re: Workhorse objection issues (0.1).	D Turetsky	1.30	2,275.00
11 October 2023	Confer with C. Tsitsis re: sale issues (0.2); review material re: sale (0.5); revise sale order (0.9); confer with D. Turetsky re: sale objection issues (0.3); confer with Buyer re: same (0.3); calls (0.9) and emails (0.9) with NHTSA lawyer re: sale issues; confer with buyer counsel re: same (0.9); confer with C. Tsitsis (Silverman) and M. Leonard, A. Kroll (Company) re: sale issues (0.5); confer with S. Kaul re: Workhorse issues (0.2); confer with D. Detweiler re: sale related notice (0.4); confer with landlord re: sale issues (0.2); confer with J. Zakia and D. Turetsky re: sale issues (0.4).	F He	6.60	8,646.00
11 October 2023	Analyze further revised proposed sale order (0.3); review and analyze draft notice of Asset Purchase Agreement assignment (0.2).	D Kim	0.50	635.00
11 October 2023	Conduct research re: issues concerning 363 sales of assets to former D&O.	P Strom	2.20	2,112.00
11 October 2023	Correspond with T. Akkoyun and follow up with A. Cieply on open LAS sale items.	S Zhang	0.20	166.00
12 October 2023	Review closing deliverables (0.3); review issues raised by Buyer re: sale of Purchased Assets (0.3).	G Pryor	0.60	1,170.00
12 October 2023	Further analysis re: Workhorse sale objection issues (0.2); email to J. Madden (Skadden) re: same (0.1); calls with R. Meisler (Skadden) re: LAS sale issues (0.5); email to R. Meisler (Skadden) re: LAS bid issues (0.1); email to Lordstown (M. Leonard, D. Ninivaggi, and A. Kroll) re: Workhorse sale objection (0.1); review	D Turetsky	2.50	4,375.00

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	DOT sale objection (0.3); calls with J. Madden (Skadden) re: LAS sale issues (0.2); call with A. Kroll (Lordstown) re: LAS sale issues (0.5); email to D. Ninivaggi (Lordstown) re: LAS sale issues (0.1); review and comment re: revised draft of sale order (0.2); call with D. Guyder (Allen Overy) re: Foxconn sale objection (0.1); email to D. Guyder (Allen & Overy) re: same (0.1).			
12 October 2023	Review of ancillary documents (0.6); confer with F. He re: sale issues (0.2); emails with D. Turetsky re: LAS issues (0.2).	A Cieply	1.00	1,460.00
12 October 2023	Confer with A. Kroll, M. Leonard (Company) re: sale issues (0.4); confer with Creditors' Committee re: same (0.1); confer with Equity Committee re: same (0.1); confer with M. Patterson (WBD) re: sale issues (0.4); confer with RIDE investor re: sale objection (0.2); confer with Ohio lead plaintiff re: same (0.2); confer with Jefferies re: sale issues (0.2); confer with C. Tsitsis (Silverman) re: sale objection issues (0.6); confer with NHTSA re: sale issues (0.4); confer with Buyer re: same (0.2); research re: sale objection issues (0.3); confer with vendor re: sale issues (0.3); confer with KCC re: service of notice (0.3); review NHTSA sale objection (0.3); confer with A. Kroll and D. Ninivaggi (Company) re: same (0.7); research re: same (0.4); draft and revise sale reply to address NHTSA objection (0.9); confer with D. Kim re: same (0.3).	F He	6.30	8,253.00
12 October 2023	Review and revise draft reply in support of sale (0.7); confer with F. He re: same (0.1); review further revised draft proposed sale order (0.2).	D Kim	1.00	1,270.00
12 October 2023	Draft email to D. Bell re: intellectual property contracts in connection with sale (0.2); review documents re: same (0.3); correspond to LAS capital counsel re: same (0.1).	R Szuba	0.60	684.00
12 October 2023	Revise reply to sale motion objections.	P Strom	0.70	672.00
12 October 2023	Prepare/revise joinder and assignment agreement and correspond with T. Akkoyun (1.8); correspond with Skadden re: closing deliverables including revised IP Assignment Agreement (0.2); send to Skadden executioner joinder and assignment agreement (0.1).	S Zhang	2.10	1,743.00
13 October 2023	Review issues raised by Buyer re: sale of assets (0.1); call with Lordstown (D. Ninivaggi, E. Hightower, A. Kroll, and M. Leonard), D. Turetsky (W&C) and (partial) A. Cieply (W&C) re: same (0.8); calls with D. Turetsky (W&C) re: same (0.2); review of Skadden letter (0.4).	G Pryor	1.50	2,925.00
13 October 2023	Email to D. Ninivaggi (Lordstown) re: Burns/LAS bid issues (0.1); call with Lordstown (D. Ninivaggi, E. Hightower, A. Kroll, and M. Leonard), G. Pryor (W&C) and A. Cieply (W&C) re: LAS Burns bid issues (0.8); calls with R. Meisler (Skadden) re: LAS sale issues	D Turetsky	2.80	4,900.00

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	(0.3); calls with G. Pryor (W&C) re: LAS sale issues (0.2); calls with J. Zakia (W&C) re: LAS sale issues (0.5); further call with A. Kroll (Lordstown) and A. Cieply (W&C) re: LAS sale issues (0.3); further emails to D. Ninivaggi (Lordstown), A. Kroll (Lordstown) and others re: LAS bid issues (0.2); further analysis re: LAS sale issues (0.4).			
13 October 2023	Multiple calls with client re: asset sale (1.2); multiple calls with D. Turetsky re: asset sale (0.5); review revised sale documents re: asset sale (1.0).	J Zakia	2.70	4,725.00
13 October 2023	Review and revise sale reply (1.2); review and comment re: Jefferies Declaration (0.5).	R Kampfner	1.70	2,703.00
13 October 2023	Calls with Lordstown (D. Ninivaggi, E. Hightower, A. Kroll, and M. Leonard), G. Pryor and D. Turetsky (W&C) re: sale to LAS (0.8); further call with A. Kroll and D. Turetsky re: same (0.3); correspond with Lordstown team, D. Turetsky, and G. Pryor re: same (0.1).	A Cieply	1.20	1,752.00
13 October 2023	Confer with KCC re: service of sale document issues (0.3); confer with M. Leonard (Company) re: same (0.2); calls (0.4) and emails (0.3) with C. Tsitsis (Silverman) re: vendor issues re: sale (0.7); emails (0.3) and call (0.3) with M. Patterson re: notice and service issues re: sale documents; call with buyer counsel re: various sale issues (0.5); call with vendor re: sale objection (0.3); confer with R. Szuba re: sale diligence issues (0.5); review proposed language from litigation party re: sale order (0.2); confer with buyer re: same (0.2).	F He	4.20	5,502.00
13 October 2023	Review and analyze revised draft of buyer's declaration in support of sale (0.3); correspond with buyer's counsel re: same (0.1).	D Kim	0.40	508.00
13 October 2023	Call with D. Bell re: intellectual property contracts re: sale process to LAS Capital (0.2); draft emails to D. Bell and M. Leonard re: same (0.2); correspond to A. Cieply and W&C M&A team re: same (0.2); confer with F. He re: same (0.2); correspond to LAS Capital counsel re: same (0.2); review documents re: same (0.3).	R Szuba	1.30	1,482.00
14 October 2023	Correspond re: existing bid with E. Hightower (Lordstown) and others (0.3); review of draft response to Skadden letter (0.6).	G Pryor	0.90	1,755.00
14 October 2023	Emails to A. Kroll (Lordstown) re: LAS sale issues (0.2); call with J. Finger (Jefferies) re: Burns/LAS sale issues (0.1); call with F. He (W&C) re: Burns/LAS sale issues (0.2); review and comment re: letter to Skadden re: LAS sale issues (0.4) and email to J. Zakia (W&C) re: same (0.1); call with R. Meisler (Skadden) re: LAS sale issues (0.3).	D Turetsky	1.30	2,275.00
14 October 2023	Confer with buyer counsel re: various sale issues (0.5);	F He	3.70	4,847.00

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	confer with KCC re: service issues for sale (0.3); confer with C. Tsitsis re: vendor issues for sale (0.4); review and comment re: buyer declaration (1.3); confer with R. Szuba re: sale diligence issues (0.3); revise sale order (0.7); confer with company re: sale questions from buyer (0.2).			
14 October 2023	Draft miscellaneous asset sale motion (3.3); research re: issues concerning same (0.9).	P Strom	4.20	4,032.00
15 October 2023	Correspond re: response letter to LAS concerning sale (0.1); review revised response letter (0.4); further review/analyze issues concerning same, including comments to response letter from A. Kroll and D. Ninivaggi (Lordstown) (0.6).	G Pryor	1.10	2,145.00
15 October 2023	Email to R. Meisler (Skadden) re: Burns/LAS sale issues (0.1); call with F. He (W&C) re: sale issues (0.2); emails to F. He (W&C) re: sale issues (0.1); calls with R. Meisler (Skadden) re: LAS issues (0.3); emails to D. Almogue (Skadden) and R. Meisler (Skadden) re: NHTSA sale objection (0.2); emails to E. Hightower (Lordstown), A. Kroll (Lordstown), and others re: LAS issues (0.1); review and comment re: Jefferies sale declaration (0.3); review revised Burns declaration in support of sale (0.2); call with R. Hamilton (Jefferies) re: LAS issues (0.1); email to R. Hamilton (Jefferies) re: same (0.1).	D Turetsky	1.70	2,975.00
15 October 2023	Confer with D. Turetsky re: sale issues (0.2); call with D. Kim re: sale issues (0.2); confer with various objection parties re: issues (1.4); research re: various issues with sale (1.3); calls (0.8) and emails (0.5) with buyer counsel re: various issues re: sale.	F He	4.40	5,764.00
15 October 2023	Review and further revise draft reply in support of sale (0.6); further review and revise draft Hamilton declaration in support of sale reply (0.3); review and revise draft proposed sale order (0.4); calls with F. He re: sale documents (0.2); correspond with D. Turetsky re: sale matters (0.1).	D Kim	1.60	2,032.00
15 October 2023	Review Jefferies declaration re: sale motion.	P Strom	0.30	288.00
16 October 2023	Review issues raised by Lordstown on resolution of asset sale questions (0.3); discuss same with A. Cieply (0.3).	G Pryor	0.60	1,170.00
16 October 2023	Emails to F. He (W&C) re: sale reply issues (0.2); review LAS/LandX comments to sale documents (0.2); review and comment re: Elaphe sale order language (0.1); calls with A. Cieply (W&C) re: Burns/LAS issues (0.4); further analysis re: LAS sale issues (0.4); further review and comment re: sale reply (0.7); calls with R. Meisler (W&C) re: sale issues (0.5); emails to E. Hightower (Lordstown), A. Kroll (Lordstown) and others re: Burns/LAS issues (0.2); call with D. Ninivaggi (Lordstown) re: LAS issues (0.1); call with F. He (W&C) re: sale reply issues (0.1); email to M. Leonard (Lordstown) re: NHTSA sale objection (0.1).	D Turetsky	3.00	5,250.00



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16 October 2023	Call with Lordstown management and buyer's counsel re: asset scope (0.6); discuss asset sale questions with G. Pryor (0.3); call with D. Turetsky re: Burns/LAS issues (0.4); confer with F. He and D. Turetsky re: sale issues (0.8).	A Cieply	2.10	3,066.00
16 October 2023	Call with buyer counsel and NHTSA counsel re: sale objection (0.8); confer with D. Turetsky re: sale objection status and issues (0.1); emails (0.4) and various calls (0.4) with counsel to Lead Plaintiff re: sale objection; further call with buyer and Lead Plaintiff counsel re: same (0.4); various emails to Committees re: sale issues (0.7); confer with Oracle counsel re: sale objection (0.3); confer with buyer counsel re: same (0.2); various calls (1.7) and emails (0.8) with buyer counsel re: sale objection and sale issues; confer with M. Leonard (Company) re: NHTSA objection (0.8); further review/analysis of sale documents (0.8).	F He	7.40	9,694.00
16 October 2023	Further revise reply in support of sale (1.7); finalize Hamilton declaration in support of sale (0.3); correspond with R. Hamilton (Jefferies) re: same (0.1); call with buyer's counsel re: comments to sale reply and buyer declaration (0.1); review revised buyer declaration in support of sale (0.4); review and further revise proposed sale order (1.0); correspond with M. Patterson (WBD) re: filing of sale documents (0.2); prepare draft filing checklist re: sale documents (0.2); correspond with F. He and M. Patterson (WBD) re: same (0.2).	D Kim	4.20	5,334.00
16 October 2023	Correspond with A. Cieply re: buyer closing certificate (0.1); revise buyer closing certificate and correspond with T. Akkoyun (0.7).	S Zhang	0.80	664.00
17 October 2023	Confer with D. Turetsky re: LAS sale issues (0.2); email to D. Ninivaggi re: sale issues (0.1).	T Lauria	0.30	630.00
17 October 2023	Discuss legal issue on sale of assets with D. Turetsky.	G Pryor	0.20	390.00
17 October 2023	Emails to R. Meisler (Skadden) re: Burns/LAS sale issues (0.1); emails to A. Kroll (Lordstown), D. Ninivaggi (Lordstown), E. Hightower (Lordstown) and others re: Burns/LAS issues (0.3); call with J. Finger (Jefferies) re: sale process issues (0.1); calls with A. Cieply (W&C) re: Burns/LAS issues (0.1); call with B. Silverberg (Brown Rudnick) re: LAS sale issues (0.3); calls with S. Grow (Warner Norcross) re: Elaphe sale issues (0.2); emails to S. Grow (Warner Norcross) re: same (0.2); calls with D. Ninivaggi (Lordstown) re: LAS issues (0.2); confer with T. Lauria (W&C) re: LAS sale issues (0.2); calls with A. Kroll (Lordstown) re: Burns/LAS issues (0.7); call with D. Kovsky (Troutman) re: Burns/LAS sale issues (0.2); call with B. Hackman (US Trustee) and Morgan Patterson (Womble) re: LAS issue (0.1); calls with F. He (W&C) re: Elaphe sale issues (0.1), LAS issues (0.1), and sale order issues (0.2); review and comment re: LAS sale proposal (0.3); calls with J. Madden (Skadden) re: LAS issues (0.4); review and comment re: sale order (0.6); emails to J.	D Turetsky	8.70	15,225.00

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Madden (Skadden) re: LAS sale matters (0.2); further review and comment re: response to Skadden/LAS NHTSA proposal (0.2); emails to J. Cushing (Brown Rudnick) re: LAS proposal (0.2); further call with J. Madden (Skadden) and F. He (W&C) re: NHTSA objection issues (0.1); emails to M. Leonard (Lordstown), A. Kroll (Lordstown), and others re: NHTSA sale objection (0.1); call with J. Zakia (W&C) re: sale issues (0.1); further review and comment re: revisions to sale order (0.4); emails to D. Kovsky (Troutman) re: clarifying sale issues (0.2); calls with A. Cieply (W&C) re: LAS sale issues (0.2); calls with R. Meisler (Skadden) re: LAS sale issues (0.9); further follow up/analysis re: resolving Burns/LAS sale issues (1.7).			
17 October 2023	Revise ancillary sale documents (1.0); confer with D. Turetsky and F. He re: same (0.2); emails with D. Turetsky re: Burns/LAS issues (0.3); calls with D. Turetsky re: same (0.1); calls with D. Turetsky re: LAS sale issues (0.2).	A Cieply	1.80	2,628.00
17 October 2023	Various calls and emails with buyer counsel and NHTSA re: sale objection (2.2); confer with various objecting parties re: resolution (1.3); revise sale order per various resolutions (0.8); confer with D. Turetsky and A. Cieply re: sale agreement (1.5); research material re: settlement with NHTSA (0.6) and discuss issues re: same with buyer's counsel (0.8); negotiate and revise sale order to incorporate settlement with buyer (2.5).	F He	9.70	12,707.00
17 October 2023	Prepare seller closing certificate and send to T. Akkoyun (0.7); send revised buyer certificate and seller certificate to A. Cieply (0.3); review NDA (0.6); correspond with T. Akkoyun and A. Cieply re: same (0.1); send executed APA and disclosure schedules to Brown Rudnick (0.1); revise closing certificates and send out to Skadden (0.5).	S Zhang	2.30	1,909.00
18 October 2023	Calls with R. Meisler (Skadden) re: LAS sale issues (0.2); call with A. Kroll (Lordstown), M. Leonard (Lordstown), A. Cieply (W&C) and F. He (W&C) re: sale issues (0.5).	D Turetsky	0.70	1,225.00
18 October 2023	Call with Lordstown (A. Kroll, M. Leonard, M. Port), and D. Turetsky and F. He re: sale closing process.	A Cieply	0.60	876.00
18 October 2023	Confer with NHTSA counsel re: objection to sale issues (0.3); confer with buyer counsel re: same (0.3); call with A. Kroll, M. Leonard and M. Port (Company) and A. Cieply and D. Turetsky (W&C) re: sale closing issues (0.9); confer with P. Strom re: miscellaneous asset sale issues (0.2); confer with M. Peterson (WBD) re: same (0.4); research re: same (0.5); confer with R. Szuba re: closing document issues (0.3).	F He	2.90	3,799.00
18 October 2023	Revise miscellaneous asset sale motion including to incorporate asset abandonment procedures.	P Strom	1.50	1,440.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
18 October 2023	Correspond with A. Cieply, M. Iloegbunam and A. Levine re: W-9s in connection with sale (0.4); update checklist and prepare punch list for T. Akkoyun's review (0.6); prepare execution versions of Bill of Sale and Assignment and Assumption Agreement (0.3); prepare draft email to Lordstown and send W-9s to T. Akkoyun for review (0.2); prepare escrow release notice, seller officer certificate and closing signature packet (1.7).	S Zhang	3.20	2,656.00
19 October 2023	Review status of closing deliverables.	G Pryor	0.30	585.00
19 October 2023	Call with A. Cieply (W&C) re: LAS issues.	D Turetsky	0.10	175.00
19 October 2023	Revise sale letter (1.4); call with D. Turetsky re: LAS issues (0.1).	A Cieply	1.50	2,190.00
19 October 2023	Confer with P. Strom re: miscellaneous asset sale motion (0.2); call with A. Kroll (company) and S. Kohl (Silverman) re: same (0.5); confer with A. Kroll and M. Port (Company) re: vendor issues re: sale (0.5).	F He	1.20	1,572.00
19 October 2023	Review and revise de minimis asset sale motion (0.6); correspond with F. He re: same (0.2).	P Strom	0.80	768.00
19 October 2023	Correspond with T. Akkoyun re: seller officer certificate (0.1); send draft escrow release notice, seller officer certificate and signature packet to A. Cieply (0.4); prepare cover email to A. Cieply re: outstanding items (0.3); correspond with M. Iloegbunam re: W-9s and send W-9s to Lordstown (0.3); correspond with Skadden re: execution versions and update checklist (0.3).	S Zhang	1.40	1,162.00
20 October 2023	Call to discuss closing mechanics with buyer's counsel and W&C team (0.6); review issues re: IT certification (0.2); review closing checklist (0.9).	G Pryor	1.70	3,315.00
20 October 2023	Call with A. Cieply (W&C) re: LAS sale issues.	D Turetsky	0.10	175.00
20 October 2023	Checklist call with buyer counsel and F. He (0.5); revise closing documents (0.2); call with D. Turetsky re: LAS issues (0.1).	A Cieply	0.80	1,168.00
20 October 2023	Closing deliverable calls with buyer counsel and A. Cieply (0.5); review assumption list and issues list (0.3); confer with C. Tsitsis (Silverman) re: same (0.5); revise misc. asset sale proc. motion and confer with A. Kroll (0.5).	F He	1.80	2,358.00
20 October 2023	Follow up with Lordstown re: W-9s (0.2); correspond with A. Cieply re: sale letter and send revised signature packet to Lordstown (0.5); follow up with A. Cieply re: open items and closing checklist (0.2); update checklist (0.3); correspond with Skadden to set up closing checklist call (0.2); send revised officer certificate re: segregation of servers to Lordstown (0.1); circulate checklist to Skadden and attend	S Zhang	2.40	1,992.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	checklist call (0.6); follow up with Lordstown re: signature packet (0.1); send officer certificate to Skadden and correspond with T. Akkoyun re: Skadden's comment (0.2).			
21 October 2023	Review sale letter and comments from A. Cieply re: same.	G Pryor	1.10	2,145.00
21 October 2023	Review of sale letter markup (0.4); confer with D. Turetsky and F. He re: same (0.1); correspond with S. Zhang re: same (0.1); revise sale letter (0.9).	A Cieply	1.50	2,190.00
21 October 2023	Confer with C. Tsitsis (Silverman) re: sale issues (0.3); review sale letter and confer with D. Turetsky and A. Cieply (0.2).	F He	0.50	655.00
21 October 2023	Correspond with T. Akkoyun and Skadden on LandX's issues (0.3); update all closing deliverables in connection with LandX issues (0.4); revise letter and correspond with A. Cieply (0.6); send revised letter to Skadden and Lordstown (0.1).	S Zhang	1.40	1,162.00
22 October 2023	Review revised sale letter.	G Pryor	0.70	1,365.00
22 October 2023	Review of sale letter (0.2); email to Lordstown team re: same (0.2).	A Cieply	0.40	584.00
22 October 2023	Confer with C. Tsitsis (Silverman) re: sale issues (0.3); confer with buyer re: same (0.2); review misc. assets sale motion (0.7); confer with M. Paterson (WBD) re: same (0.1).	F He	1.30	1,703.00
23 October 2023	Address closing issues, including closing call schedule.	G Pryor	1.30	2,535.00
23 October 2023	Call with Skadden re: sale letter (0.3); revise re: same (0.4); confer with F. He re: sale question from company (0.1).	A Cieply	0.80	1,168.00
23 October 2023	Confer with C. Tsitsis (Silverman) re: sale closing issues (0.5); emails and calls with M. Leonard (Company) and S. Kohler (Silverman) re: buyer diligence request (0.4); review diligence received (0.3) and prepare response to buyer (0.4); further confer with A. Bauer, C. Tsitsis and S. Kohler (Silverman) re: buyer diligence issues (0.4); review additional material in response to buyer diligence request (0.7); confer with L. Sim re: closing issues (0.5); confer with A. Kroll (Company) re: vendor inquiry re: sale (0.3); confer with A. Cieply re: sale question from company (0.3); confer with buyer counsel re: assumption list issues (0.4) and other sale issues (0.4); research re: sale issues (0.7).	F He	5.30	6,943.00
23 October 2023	Correspond with T. Akkoyun and A. Cieply re: seller officer certificate (0.2); share Irvine monthly expenses with Skadden and correspond with Lordstown (0.2); update sale letter and send to Skadden and Lordstown (0.4); correspond with J. Al-Buainain re: assignment	S Zhang	1.10	913.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	and assumption agreement (0.1); correspond with Lordstown re: signature pages and resend DocuSign (0.2).			
24 October 2023	Further analyze sale closing issues (0.3); review updated draft of sale letter (0.4).	G Pryor	0.70	1,365.00
24 October 2023	Calls with A. Cieply (W&C) re: LandX/LAS sale issues (0.2); call with R. Meisler (Skadden) re: LandX/LAS sale issues (0.2).	D Turetsky	0.40	700.00
24 October 2023	Revise sale letter (0.3); calls with D. Turetsky re: LandX/LAS sale issues (0.2); confer with D. Turetsky and F. He re: sale issues (0.2).	A Cieply	0.70	1,022.00
24 October 2023	Confer with buyer counsel re: sale issues (0.7); confer with A. Kroll (Company) re: sale issues (0.2); calls (0.5) and emails (0.2) with M. Mollerus re: sale issues; confer with M. Leonard (Company) re: sale issue (0.4).	F He	2.00	2,620.00
24 October 2023	Correspond with Lordstown re: signature pages for sale closing (0.1); send Lordstown signature pages to Skadden (0.1); correspond with Skadden and Lordstown re: sale letter (0.3) and revise sale letter (0.6); further correspond with Skadden and Lordstown re: purchased assets and purchase price adjustments (0.3); review APA and correspond with T. Akkoyun and F. He re: California tax issues (0.2); correspond with T. Akkoyun re: sale next steps (0.2); further correspond with Lordstown re: closing date issues (0.1); follow up with Skadden re: signature pages (0.1); coordinate with Lordstown re: closing call (0.1); compile closing documents (1.2).	S Zhang	3.30	2,739.00
25 October 2023	Prepare/analysis re: open issues for sale closing.	G Pryor	0.60	1,170.00
25 October 2023	Preparation for sale closing (0.3); correspond with S. Zhang re: provisions of sale agreements (0.1).	A Cieply	0.40	584.00
25 October 2023	Correspond with Lordstown re: signature pages and closing call (0.2); correspond with F. He re: updated disclosure schedule Section 2.1 (0.1); complete compiling closing documents and send to T. Akkoyun for review (0.5); send escrow release notice and correspond with Citi (0.3); send closing deliverables to Skadden in escrow (0.1); correspond with Lordstown re: wire instructions and callback (0.2); review APA and correspond with A. Cieply and F. He re: Lordstown's obligation to change its name (0.5); correspond with A. Cieply and Skadden re: side letter (0.5); correspond with T. Akkoyun and A. Levine re: closing set (0.3).	S Zhang	2.70	2,241.00
26 October 2023	Preparation/analysis re: open issues for sale closing.	A Cieply	0.30	438.00
26 October 2023	Correspond with T. Akkoyun re: closing set (0.1); correspond with Skadden re: closing call (0.2); correspond with Lordstown and Citi re: callback verification (0.3); correspond with Fleming PLLC and	S Zhang	0.80	664.00

**WHITE & CASE**

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	forward closing call invite (0.2).			
27 October 2023	Attend closing of sale.	A Cieply	0.30	438.00
27 October 2023	Attend closing call (0.2); confer with respect to post-sale issue with M. Leonard and A. Kroll (Company) (0.4); confer with A. Kroll re: misc. asset sale procedures (0.7); research re: same (0.5); review and revise motion (0.6).	F He	2.40	3,144.00
27 October 2023	Revise misc. asset sale procedures motion per company comments (0.5); correspond with F. He re: same (0.2).	P Strom	0.70	672.00
27 October 2023	Attend closing call (0.1); instruct Citi to release escrow (0.1); revise closing set index and correspond with T. Akkoyun (0.4); correspond with A. Levine re: closing set (0.4); correspond with Lordstown and Skadden re: wire fed reference numbers (0.2); share closing set with Lordstown (0.2).	S Zhang	1.40	1,162.00
29 October 2023	Confer with Equity Committee re: misc. asset sale procedures (0.2); confer with Creditors' Committee re: same (0.2).	F He	0.40	524.00
30 October 2023	Confer with Equity Committee re: misc. asset sale procedures (0.4); confer with A. Kroll re: same (0.6); confer with P. Strom re: research issues (0.2); revise motion (0.8).	F He	2.00	2,620.00
30 October 2023	Conduct research re: motion to sell or dispose of miscellaneous assets (0.3); correspond with F. He re: same (0.2).	P Strom	0.50	480.00
30 October 2023	Update MPQ and correspond with T. Akkoyun and A. Cieply.	S Zhang	0.20	166.00
30 October 2023	Research precedent re: de minimis assets for P. Strom and F. He.	D Hirshorn	0.50	190.00
31 October 2023	Confer with F. He re: misc. asset sale procedures motion (0.2); correspond to Womble team re: filing same (0.2); correspond to D. Kovsky (Creditors' Committee) re: same (0.1); correspond to B. Silverberg (Equity Committee) re: same (0.1); draft misc. asset sale motion (0.5); correspond with A. Kroll and company re: same (0.1); prepare and cause same to be filed (0.1).	R Szuba	1.30	1,482.00
31 October 2023	Review and revise motion to sell or dispose of miscellaneous assets.	P Strom	1.20	1,152.00
<b>SUBTOTAL: Asset Analysis, Sale &amp; Disposition</b>			<b>210.30</b>	<b>276,356.00</b>

**Business Operations, Vendor & Utility Issues**

2 October 2023	Review and revise vendor letter for M. Leonard	F He	0.40	524.00
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**WHITE & CASE**

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(Company).			
5 October 2023	Confer with vendor re: claims for payment (0.3); research re: vendor issues (0.2) and confer with A. Kroll re: same (0.1).	F He	0.60	786.00
5 October 2023	Correspond to F. He re: post-Effective Date operations (0.3); review documents re: same (0.2).	R Szuba	0.50	570.00
5 October 2023	Research re: customer warranty claim issues.	L Mezei	2.10	2,142.00
9 October 2023	Call with B. Silverberg (Brown Rudnick) re: vehicle buyback issues (0.1); calls with D. Ninivaggi (Lordstown) re: vehicle buyback issues (0.1); email to M. Leonard (Lordstown) re: vehicle buyback issues (0.2); call with D. Kovsky (Troutman) re: vehicle buyback issues (0.1); call with M. Leonard (Lordstown) re: vehicle buyback issues (0.2).	D Turetsky	0.70	1,225.00
10 October 2023	Email to M. Leonard (Lordstown) re: vehicle buyback issues (0.1); call with F. Lawall (Troutman) and D. Kovsky (Troutman) re: vehicle buyback issues (0.2); call with Lordstown (D. Ninivaggi, M. Leonard), C. Iannetta (Nelson Mullins), and F. He (W&C) re: vehicle buyback issues (0.7).	D Turetsky	1.00	1,750.00
10 October 2023	Confer with D. Turetsky re: vehicle issues (0.2); confer with L. Mezei and P. Strom re: vehicle issues (0.4); research re: same (0.5); call with D. Ninivaggi, M. Leonard (Company) and D. Turetsky (W&C) re: vehicle issues (0.7).	F He	1.80	2,358.00
11 October 2023	Call with D. Ninivaggi (Lordstown) re: vehicle buyback issues (0.2); email to D. Ninivaggi (Lordstown) and M. Leonard (Lordstown) re: same (0.1); call with Troutman (F. Lawall, D. Kovsky), M. Leonard (Lordstown), and F. He (W&C) re: vehicle buyback issues (0.7).	D Turetsky	1.00	1,750.00
11 October 2023	Call with Creditors' Committee and M. Leonard (Company) and D. Turetsky (W&C) re: vehicle warranty/recall issues.	F He	0.70	917.00
12 October 2023	Call with J. Zakia re: letter to Foxconn re: vehicle recall issues (0.4); review correspondence with C. Iannetta (Debtors) re: same (0.2).	S Kaul	0.60	636.00
13 October 2023	Confer with regulatory counsel for company re: vehicle warranty issues.	F He	0.30	393.00
16 October 2023	Confer with A. Kroll, M. Leonard, M. Port (Company) and C. Tsitsis, S. Kohler (Silverman) re: various operational issues.	F He	0.30	393.00
18 October 2023	Call with D. Ninivaggi (Lordstown) and E. Hightower (Lordstown) re: vehicle buyback issues (0.3); call with R. Kampfner (W&C) re: vehicle buyback issues (0.2).	D Turetsky	0.50	875.00



**WHITE & CASE**

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
18 October 2023	Call with D. Turetsky re: vehicle buyback issues.	R Kampfner	0.20	318.00
24 October 2023	Call with D. Ninivaggi (Lordstown) re: vehicle repurchase issues (0.1); call with J. Zakia (W&C) re: vehicle repurchase issues (0.2).	D Turetsky	0.30	525.00
24 October 2023	Revise/draft motion re: vehicle repurchases.	F He	3.40	4,454.00
24 October 2023	Draft motion to repurchase previously-sold vehicles.	P Strom	1.20	1,152.00
25 October 2023	Call with Lordstown (D. Ninivaggi, E. Hightower, M. Leonard, and A. Kroll) and J. Zakia (W&C) re: vehicle buyback issues (0.4); call with J. Zakia (W&C) re: vehicle buyback issues (0.1).	D Turetsky	0.50	875.00
25 October 2023	Confer with client (D. Ninivaggi, E. Hightower, M. Leonard, A. Kroll) and D. Turetsky re: warranty claims and vehicle buyback (0.4); confer with Foxconn's counsel re: same (0.6); confer with D. Turetsky re: same (0.1).	J Zakia	1.10	1,925.00
25 October 2023	Draft and revise motion re: vehicle repurchase.	F He	2.60	3,406.00
25 October 2023	Revise motion to repurchase vehicles per F. He comments.	P Strom	0.50	480.00
30 October 2023	Call with A. Kroll, M. Leonard and M. Port (Company) and S. Kohler (Silverman) re: various operational issues.	F He	0.30	393.00
31 October 2023	Draft and revise agreement with vendor to resolve balance.	F He	0.50	655.00
<b>SUBTOTAL: Business Operations, Vendor &amp; Utility Issues</b>			<b>21.10</b>	<b>28,502.00</b>

**Case Administration**

2 October 2023	Confer with KCC re: website issues.	F He	0.10	131.00
2 October 2023	Analyze and revise case workstreams tracker.	D Kim	0.20	254.00
3 October 2023	Correspond with F. He re: pending case matters (0.1); confer with L. Mezei re: workstream tracker based on same (0.1); review and provide comments to case issues tracker (0.2); team call with F. He, L. Mezei, A. Kropp re: case status and pending workstreams matters (0.6).	D Kim	1.00	1,270.00
3 October 2023	Update work in progress tracker (0.6); attend work in progress call with W&C associates (0.5).	L Mezei	1.10	1,122.00
3 October 2023	Update pleadings file (0.4); update case calendar (0.3).	D Hirshorn	0.70	266.00
4 October 2023	Call shareholder in connection with shareholder	L Mezei	0.40	408.00



**WHITE & CASE**

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	inquiry.			
4 October 2023	Update pleadings file.	D Hirshorn	0.30	114.00
6 October 2023	Call shareholder in connection with shareholder inquiry.	L Mezei	0.10	102.00
6 October 2023	Monitor docket for recent activity (0.1); update pleadings file (0.2); update case calendar (0.2).	D Hirshorn	0.50	190.00
9 October 2023	Revise workstreams tracker (0.1); correspond with L. Mezei re: same (0.1); analyze revised critical case calendar (0.1).	D Kim	0.30	381.00
9 October 2023	Update pleadings file (0.1); update case calendar (0.2).	D Hirshorn	0.30	114.00
10 October 2023	Call with F. He, P. Strom, J. Green and team re: case status and ongoing workstreams (0.5); review revised tracker for same (0.1).	D Kim	0.60	762.00
10 October 2023	Call shareholder in connection with shareholder inquiry.	L Mezei	0.20	204.00
10 October 2023	Call with F. He, D. Kim, L. Mezei, A Kropp and others re: work-in-process status.	P Strom	0.30	288.00
11 October 2023	Review and further revise ongoing workstream tracker.	D Kim	0.10	127.00
12 October 2023	Analyze revised critical case calendar (0.2); review and provide comments to case task list (0.1); oversee other case administrative tasks (0.1).	D Kim	0.40	508.00
12 October 2023	Update pleadings file (0.3); update case calendar (0.1).	D Hirshorn	0.40	152.00
13 October 2023	Correspond with A. Estrada re: service of certain sale notices (0.1); review and revise pending case matters (0.2); confer with F. He re: same (0.1).	D Kim	0.40	508.00
16 October 2023	Revise open task list and matters for case.	D Kim	0.20	254.00
16 October 2023	Update pleadings file (0.2); update case calendar (0.2).	D Hirshorn	0.40	152.00
17 October 2023	Conduct weekly work in progress call with D. Kim, A. Kropp, L. Mezei, P. Strom and W&C associates.	F He	0.50	655.00
17 October 2023	Team call with F. He, R. Szuba, L. Mezei, P. Strom, J. Green and team re: case updates and pending matters (0.5); review and revise task list for same (0.3).	D Kim	0.80	1,016.00
17 October 2023	Attend work in progress call with F. He, D. Kim, A. Kropp, P. Strom and W&C associates.	L Mezei	0.50	510.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
17 October 2023	Call with F. He, D. Kim, R. Szuba, P. Strom, L. Mezei and others re: work-in-process matters.	P Strom	0.50	480.00
17 October 2023	Download and circulate preliminary asset list for F. He (0.4); update pleadings file (0.2); update case calendar (0.2); circulate preliminary asset list to Equity Committee and Official Committee of Unsecured Creditors (0.1).	D Hirshorn	0.90	342.00
20 October 2023	Update pleadings file (0.2); update case calendar (0.1).	D Hirshorn	0.30	114.00
23 October 2023	Confer with F. He re: pending case matters (0.1); review and provide updates to work in progress tracker based on same (0.2).	D Kim	0.30	381.00
24 October 2023	Email to F. He (W&C) and D. Kim (W&C) re: open workstreams.	D Turetsky	0.10	175.00
24 October 2023	Conduct weekly work in progress call with W&C associates (D. Kim, R. Szuba, P. Strom).	F He	0.50	655.00
24 October 2023	Team call with F. He, R. Szuba, L. Mezei, P. Strom and team re: open tasks and case matters (0.6); review and provide comments to administrative tracker for same (0.1).	D Kim	0.70	889.00
24 October 2023	Attend work in progress call with F. He, A. Kropp, D. Kim, L. Mezei, P. Strom and W&C associates.	R Szuba	0.50	570.00
24 October 2023	Attend work in progress call with F. He, D. Kim, A. Kropp, P. Strom, R. Szuba (0.6); update work in progress tracker (0.4).	L Mezei	1.00	1,020.00
24 October 2023	Call with F. He, D. Kim and others re: work-in-process status.	P Strom	0.60	576.00
27 October 2023	Update pleadings file.	D Hirshorn	0.10	38.00
30 October 2023	Review and revise case task list.	D Kim	0.20	254.00
30 October 2023	Update pleadings file.	D Hirshorn	0.40	152.00
31 October 2023	Call with P. Strom, L. Mezei, F. He, R. Szuba, J. Green and team re: case status and administrative matters.	D Kim	0.50	635.00
31 October 2023	Attend work in progress call with F. He, D. Kim, P. Strom, and W&C associates.	R Szuba	0.50	570.00
31 October 2023	Call with F. He, D. Kim and others re: case matters and work in progress.	P Strom	0.50	480.00
<b>SUBTOTAL: Case Administration</b>			<b>17.40</b>	<b>16,819.00</b>

## Case Strategy

**WHITE & CASE**

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
2 October 2023	Call with W&C (R. Szuba, F. He, and D. Kim) re: case issues and strategy.	D Turetsky	0.40	700.00
2 October 2023	Confer with client re: case strategy.	J Zakia	0.40	700.00
2 October 2023	Attend internal strategy call with D. Turetsky, F. He, D. Kim and R. Szuba.	R Kampfner	0.40	636.00
2 October 2023	Call with D. Turetsky, D. Kim and R. Szuba re: various developments and strategy.	F He	0.40	524.00
2 October 2023	Call with D. Turetsky, F. He, R. Szuba re: open case issues and sale strategy.	D Kim	0.40	508.00
2 October 2023	Attend call with D. Turetsky, R. Kampfner, F. He, and D. Kim re: case strategy.	R Szuba	0.40	456.00
3 October 2023	Call with W&C team (R. Kampfner, D. Kim, R. Szuba, and F. He) re: case issues and strategy.	D Turetsky	0.50	875.00
3 October 2023	Confer with D. Turetsky re: case strategy.	J Zakia	0.40	700.00
3 October 2023	Attend internal strategy call with D. Turetsky, F. He, D. Kim and R. Szuba.	R Kampfner	0.50	795.00
3 October 2023	Call with D. Turetsky, R. Kampfner, D. Kim and R. Szuba re: various developments and strategy.	F He	0.50	655.00
3 October 2023	Team call with R. Kampfner, D. Turetsky, F. He, R. Szuba re: Plan and sale issues and strategy.	D Kim	0.40	508.00
3 October 2023	Attend case strategy call with R. Kampfner, F. He, and D. Kim.	R Szuba	0.50	570.00
4 October 2023	Call with W&C team (D. Kim, R. Szuba, F. He, and R. Kampfner) re: case issues and strategy.	D Turetsky	0.30	525.00
4 October 2023	Call with D. Turetsky, D. Kim and R. Szuba re: various developments and strategy.	F He	0.30	393.00
4 October 2023	Team call with F. He, R. Kampfner, D. Turetsky, R. Szuba re: open case strategy and open issues.	D Kim	0.30	381.00
4 October 2023	Attend case strategy call with R. Kampfner, F. He, and D. Kim.	R Szuba	0.30	342.00
5 October 2023	Call with W&C team (R. Kampfner, D. Kim, R. Szuba, and F. He) re: case issues and strategy.	D Turetsky	0.40	700.00
5 October 2023	Attend internal strategy call with D. Turetsky, F. He, D. Kim and R. Szuba.	R Kampfner	0.40	636.00
5 October 2023	Call with D. Turetsky, R. Kampfner, D. Kim and R. Szuba re: various developments and strategy.	F He	0.40	524.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
5 October 2023	Team call with D. Turetsky, R. Kampfner, F. He, R. Szuba re: case updates and strategy.	D Kim	0.40	508.00
5 October 2023	Attend case strategy call with D. Turetsky, R. Kampfner, F. He, and D. Kim.	R Szuba	0.40	456.00
6 October 2023	Call with W&C team (D. Kim, R. Szuba, F. He, and R. Kampfner) re: case issues and strategy matters.	D Turetsky	0.70	1,225.00
6 October 2023	Call with D. Turetsky, R. Kampfner, D. Kim and R. Szuba re: various developments and strategy.	F He	0.50	655.00
6 October 2023	Team call with R. Kampfner, D. Turetsky, F. He, R. Szuba re: case updates and go forward strategy.	D Kim	0.70	889.00
6 October 2023	Attend case strategy call with D. Turetsky, R. Kampfner, F. He, and D. Kim.	R Szuba	0.70	798.00
8 October 2023	Email to D. Ninivaggi (Lordstown) re: case update and strategy.	D Turetsky	0.20	350.00
9 October 2023	Call with R. Kampfner, D. Kim and R. Szuba re: various developments and strategy.	F He	0.50	655.00
9 October 2023	Call with R. Kampfner, F. He, R. Szuba re: case updates and Plan strategy.	D Kim	0.50	635.00
9 October 2023	Attend case strategy call with R. Kampfner, F. He, and D. Kim.	R Szuba	0.50	570.00
10 October 2023	Call with D. Turetsky, R. Kampfner, D. Kim and R. Szuba re: various developments and strategy.	F He	0.60	786.00
10 October 2023	Team call with R. Kampfner, F. He, R. Szuba re: Plan strategy and other case matters.	D Kim	0.60	762.00
10 October 2023	Attend case strategy call with R. Kampfner, F. He, and D. Kim.	R Szuba	0.50	570.00
11 October 2023	Call with W&C team (D. Kim, F. He, R. Szuba) re: case strategy and issues.	D Turetsky	0.50	875.00
11 October 2023	Call with D. Turetsky, R. Kampfner, D. Kim and R. Szuba re: various developments and strategy.	F He	0.50	655.00
11 October 2023	Attend case strategy call with D. Turetsky, R. Kampfner, F. He, and D. Kim.	R Szuba	0.50	570.00
12 October 2023	Call with W&C team (F. He, R. Szuba, and R. Kampfner) re: case issues and strategy.	D Turetsky	0.70	1,225.00
12 October 2023	Confer with client re: case strategy.	J Zakia	0.50	875.00
12 October 2023	Attend internal (R. Szuba, F. He, D. Kim, D. Turetsky) call re: developments.	R Kampfner	0.70	1,113.00

**WHITE & CASE**

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
12 October 2023	Call with D. Turetsky, R. Kampfner, and R. Szuba re: various developments and strategy.	F He	0.70	917.00
12 October 2023	Attend case strategy call with R. Kampfner, F. He, and D. Kim.	R Szuba	0.70	798.00
13 October 2023	Call with W&C team (R. Kampfner, R. Szuba, D. Kim, F. He) re: case issues and strategy.	D Turetsky	0.60	1,050.00
13 October 2023	Call with D. Turetsky, R. Kampfner, D. Kim and R. Szuba re: various developments and strategy.	F He	0.60	786.00
13 October 2023	Call with R. Kampfner, D. Turetsky, F. He, R. Szuba re: sale matters and related strategy.	D Kim	0.50	635.00
13 October 2023	Attend case strategy call with R. Kampfner, F. He, and D. Kim.	R Szuba	0.60	684.00
14 October 2023	Call with J. Zakia, R. Kampfner and D. Turetsky re: case strategy and issues (1.4); further attention re: case strategy issues (0.6).	T Lauria	2.00	4,200.00
14 October 2023	Call with W&C team (T. Lauria, J. Zakia, R. Kampfner) re: case strategy and issues (1.4); emails to T. Lauria (W&C) re: case issues and strategy (0.3).	D Turetsky	1.70	2,975.00
14 October 2023	Call with T. Lauria, D. Turetsky and R. Kampfner re: case strategy (1.5); confer with D. Turetsky re: strategy (0.5).	J Zakia	2.00	3,500.00
14 October 2023	Attend call with D. Turetsky, T. Lauria and J. Zakia re: strategy/next steps.	R Kampfner	1.40	2,226.00
16 October 2023	Email to T. Lauria (W&C) re: case strategy issues.	D Turetsky	0.20	350.00
16 October 2023	Call with D. Turetsky, R. Kampfner, D. Kim and R. Szuba re: various developments and strategy.	F He	0.50	655.00
16 October 2023	Team call with F. He, R. Szuba, R. Kampfner re: Plan matters and case strategy.	D Kim	0.60	762.00
16 October 2023	Attend case strategy call with D. Turetsky, F. He, and D. Kim.	R Szuba	0.50	570.00
17 October 2023	Call with D. Turetsky, R. Kampfner, D. Kim and R. Szuba re: various developments and strategy.	F He	0.50	655.00
20 October 2023	Call with W&C team (F. He, D. Kim, R. Szuba) re: case issues and strategy.	D Turetsky	0.50	875.00
20 October 2023	Call with R. Kampfner, D. Kim and R. Szuba re: various developments and strategy.	F He	0.50	655.00
20 October 2023	Call with D. Turetsky, R. Szuba, R. Kampfner, F. He re: case updates and ongoing strategy.	D Kim	0.40	508.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
20 October 2023	Attend case strategy call with D. Turetsky, R. Kampfner, F. He, D. Kim.	R Szuba	0.50	570.00
23 October 2023	Call with R. Kampfner, D. Kim and R. Szuba re: various developments and strategy (0.5); call with M. Leonard, A. Kroll and M. Port (Company) re: various issues and strategy for case (0.5).	F He	1.00	1,310.00
23 October 2023	Call with R. Kampfner, F. He, R. Szuba re: Plan updates and strategy.	D Kim	0.20	254.00
24 October 2023	Call with W&C team (D. Kim, R. Szuba, and F. He) re: case issues and strategy.	D Turetsky	0.80	1,400.00
24 October 2023	Call (partial) with D. Turetsky, F. He, D. Kim and R. Szuba re: various developments and strategy.	R Kampfner	0.50	795.00
24 October 2023	Call with D. Turetsky, R. Kampfner, D. Kim and R. Szuba re: various developments and strategy.	F He	0.80	1,048.00
24 October 2023	Case strategy call with D. Turetsky, F. He, and D. Kim.	R Szuba	0.80	912.00
25 October 2023	Call with W&C team (D. Kim, R. Szuba, R. Kampfner, and F. He) re: case status and strategy.	D Turetsky	0.80	1,400.00
25 October 2023	Call with R. Kampfner, D. Kim and R. Szuba re: various developments and strategy.	F He	0.80	1,048.00
25 October 2023	Call with R. Kampfner, D. Turetsky, R. Szuba, F. He re: Disclosure Statement and Plan issues and strategy.	D Kim	0.80	1,016.00
25 October 2023	Call with R. Kampfner, D. Turetsky, F. He, and D. Kim re: case strategy.	R Szuba	0.80	912.00
26 October 2023	Call with W&C team (F. He, D. Kim, and R. Szuba) re: case strategy and issues.	D Turetsky	0.30	525.00
26 October 2023	Call with R. Kampfner, D. Kim and R. Szuba re: various developments and strategy.	F He	0.50	655.00
26 October 2023	Team call with D. Turetsky, R. Kampfner, F. He, R. Szuba re: Plan and Disclosure Statement issues and strategy.	D Kim	0.50	635.00
26 October 2023	Attend case strategy call with R. Kampfner, D. Turetsky, D. Kim and F. He.	R Szuba	0.40	456.00
27 October 2023	(partial) call with W&C team (F. He, R. Szuba, and R. Kampfner) re: case strategy and issues.	D Turetsky	0.20	350.00
27 October 2023	Call with R. Kampfner, D. Kim and R. Szuba re: various developments and strategy.	F He	0.50	655.00
27 October 2023	Attend case strategy call with D. Turetsky, R. Kampfner, and D. Kim.	R Szuba	0.50	570.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
30 October 2023	Call with R. Kampfner, D. Kim and R. Szuba re: various developments and strategy.	F He	0.50	655.00
30 October 2023	Team call with R. Kampfner, R. Szuba, F. He, D. Turetsky re: case strategy.	D Kim	0.60	762.00
30 October 2023	Call with R. Kampfner, D. Kim, D. Turetsky, and F. He re: case strategy.	R Szuba	0.40	456.00
31 October 2023	Call with R. Kampfner, D. Kim and R. Szuba re: various developments and strategy.	F He	0.70	917.00
31 October 2023	Team call with R. Kampfner, F. He, R. Szuba re: case matters and strategy.	D Kim	0.50	635.00
31 October 2023	Call with R. Kampfner, F. He, and D. Kim re: case strategy.	R Szuba	0.50	570.00
<b>SUBTOTAL: Case Strategy</b>			<b>46.20</b>	<b>66,607.00</b>

### Claims Administration & Objections

2 October 2023	Analyze proposed procedures for disputed claim process (0.4); prepare road map and task list based on same (0.2); confer with L. Mezei re: same (0.2).	D Kim	0.80	1,016.00
3 October 2023	Analyze SEC's motion to extend time to file discharge complaint (0.2); correspond with A. Estrada of KCC re: revised claim register (0.1).	D Kim	0.30	381.00
3 October 2023	Analyze re: disputed claims (2.4) and coordinate with KCC re: issues concerning claims process (0.8).	L Mezei	3.20	3,264.00
5 October 2023	Call with F. He (W&C) re: Singh claims motion issue.	D Turetsky	0.10	175.00
5 October 2023	Call shareholder re: proof of claim.	L Mezei	0.20	204.00
6 October 2023	Research/analysis re: director indemnification claims.	D Turetsky	0.40	700.00
6 October 2023	Research re: creditor proof of claim issue (0.3); confer with M. Leonard re: same (0.2); confer with R. Singh re: motion for payment (0.4).	F He	0.90	1,179.00
6 October 2023	Correspond with D. Turetsky re: 510(b) subordination issue.	R Szuba	0.20	228.00
6 October 2023	Review claims for classification/claim objection matters.	L Mezei	2.30	2,346.00
6 October 2023	Review D&O claims issues (0.3); correspond with F. He and KCC re: same (0.1).	P Strom	0.40	384.00
7 October 2023	Call with M. Leonard (Company) re: proof of claim issues.	F He	0.10	131.00

**WHITE & CASE**

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
9 October 2023	Confer with R. Szuba re: SEC priority claim issues.	R Kampfner	0.20	318.00
9 October 2023	Confer with R. Kampfner re: SEC priority claim issue (0.2); correspond with P. Strom re: SEC claim priority research (0.2); research re: priority of SEC claim (1.8); draft analysis re: same to R. Kampfner (0.6).	R Szuba	2.80	3,192.00
9 October 2023	Call shareholders re: proof of claims and bankruptcy of the company.	L Mezei	0.30	306.00
9 October 2023	Conduct legal research re: subordination of potential SEC claims against estates.	P Strom	2.50	2,400.00
10 October 2023	Email to F. He (W&C), D. Kim (W&C), and R. Szuba (W&C) re: bar date issues.	D Turetsky	0.10	175.00
10 October 2023	Review and revise objection to Singh motion for payment (0.4); confer with D. Turetsky re: same (0.3); confer with M. Patterson re: same (0.3).	F He	1.00	1,310.00
10 October 2023	Review and analyze revised claims register (0.5); confer with F. He re: same (0.2); correspond with A. Estrada of KCC re: filed claims (0.1).	D Kim	0.80	1,016.00
10 October 2023	Further conduct legal research re: potential issues with Plan treatment of SEC claims against estates.	P Strom	4.30	4,128.00
11 October 2023	Email to D. Kim (W&C) re: bar date issues (0.1); email to B. Silverberg (Brown Rudnick), R. Stark (Brown Rudnick) and others re: bar date issues (0.1); further review and comment re: objection to Singh motion to pay claim (0.1); call with J. Zakia (W&C) re: SEC claim issues (0.2).	D Turetsky	0.50	875.00
11 October 2023	Review and revise objection to Singh motion (0.5); confer with M. Leonard re: same (0.3); confer with M. Patterson (WBD) re: same (0.2).	F He	1.00	1,310.00
11 October 2023	Review and analyze preliminary claims register report (0.5); confer with F. He re: same (0.2); correspond with R. Szuba re: requests from Official Committees for same (0.1).	D Kim	0.80	1,016.00
11 October 2023	Correspond with D. Kovsky re: claims register report (0.2); correspond with A. Estrada and KCC team re: same (0.2); review claims report from KCC (0.2); correspond to company and Silverman re: same (0.1); research re: 510(b) treatment issue (0.3); review relevant briefing re: same (0.3); correspond to R. Kampfner and D. Turetsky re: same (0.1).	R Szuba	1.40	1,596.00
11 October 2023	Review claims for classification/claim objection matters.	L Mezei	3.60	3,672.00
12 October 2023	Further review revised claims register report (0.4); analyze potential objections for voting purposes (0.5).	D Kim	0.90	1,143.00



LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
13 October 2023	Analyze correspond and research re: omnibus claim objection (0.2); correspond with L. Mezei re: same (0.1).	D Kim	0.30	381.00
13 October 2023	Call with M. Port (company) re: claims analysis (0.2); analysis re: certain claims (0.2); draft email to M. Port re: same (0.2).	R Szuba	0.60	684.00
13 October 2023	Review creditor and equity interest claims for classification/claim objection matters.	L Mezei	1.90	1,938.00
14 October 2023	Conduct analysis of class classification issues.	R Kampfner	0.50	795.00
14 October 2023	Review and revise draft omnibus claim objection (0.6); analyze preliminary claim analysis for same (0.4); correspond with L. Mezei re: same (0.1).	D Kim	1.10	1,397.00
16 October 2023	Call with Dechert re: proof of claim (0.4); review director proofs of claim (0.4).	J Zakia	0.80	1,400.00
16 October 2023	Analyze preliminary claim analysis from company for preparation of omnibus claim objections.	D Kim	0.50	635.00
16 October 2023	Draft email to A. Crnkovich (Silverman) re: claims analysis (0.1); research re: same (0.1); correspond to A. Estrada (KCC), M. Leonard, and company re: claims report (0.4).	R Szuba	0.60	684.00
17 October 2023	Call with M. Port re: claim reconciliation issues.	F He	0.50	655.00
17 October 2023	Correspond with A. Estrada re: revised claims register (0.2); review and analyze further claims analysis from company re: potential claim objections (0.3); correspond with F. He re: same (0.1).	D Kim	0.60	762.00
18 October 2023	Analyze claims analysis and revised claims report from KCC (1.2); correspond with A. Estrada of KCC re: same (0.3); correspond with L. Mezei re: same (0.3); review claims for potential omnibus claim objections (0.2); review and analyze order denying Singh motion (0.1).	D Kim	2.10	2,667.00
19 October 2023	Call with J. Zakia (W&C) re: director indemnification claims (0.2); call with Dechert (A. Levander, S. Vasser, J. Zakia (W&C), D. Ninivaggi (Lordstown), D. Hamamoto (Lordstown Board), and J. Zakia (W&C) re: director indemnification claims (1.0); call with D. Bender (Haynes Boone) and R. Kampfner (W&C) re: D&O indemnification issues (0.2); further calls with D. Bender (Haynes Boone) re: D&O indemnification issues (0.2); emails to D. Bender (Haynes Boone) re: D&O indemnification issues (0.1); call with D. Detweiler (Womble) and J. Zakia (W&C) re: director indemnification claims (0.5).	D Turetsky	2.20	3,850.00
19 October 2023	Call with D. Bender (HB) and D. Turetsky re: D&O indemnification issues.	R Kampfner	0.20	318.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
19 October 2023	Call with A. Estrada (KCC) re: solicitation service plan (0.7); review and analyze preliminary claims analysis for voting purposes (0.6); analyze certain proofs of claim based on same (0.4); confer with L. Mezei and P. Strom re: claims review process (0.3); further review revised voting claims report from KCC (0.5); prepare preliminary analysis for equity claims based on same (0.5).	D Kim	3.00	3,810.00
19 October 2023	Call with KCC re: claims issues (0.6); call with P. Strom re: same (0.2); discuss with D. Kim re: same (0.3); continue review of claims for classification/potential objection matters (2.3).	L Mezei	3.40	3,468.00
19 October 2023	Research re: section 510(b) analysis with respect to certain claims.	P Strom	2.30	2,208.00
20 October 2023	Review legal research re: subordination of indemnification claims.	J Zakia	0.80	1,400.00
20 October 2023	Call with A. Estrada of KCC re: claims report and related issues (0.4); analyze potential claims to object (0.3); correspond with F. He re: same (0.1).	D Kim	0.80	1,016.00
21 October 2023	Revise Debtors' first omnibus claim objection for misclassified claims (0.6); confer with F. He, R. Szuba re: same (0.2).	D Kim	0.80	1,016.00
23 October 2023	Call with A. Ericksen (W&C) re: SEC/claim issues.	D Turetsky	0.10	175.00
24 October 2023	Confer with F. He re: potential disputed claims.	D Kim	0.10	127.00
25 October 2023	Call with J. Zakia (W&C) re: class proof of claim issues for objection.	D Turetsky	0.10	175.00
25 October 2023	Confer with D. Turetsky re: class proof of claim issues.	J Zakia	0.10	175.00
26 October 2023	Review/analysis 510(b) subordination issues.	R Kampfner	0.90	1,431.00
26 October 2023	Call with J. Zakia re: class proofs of claim (0.4); review proofs of claim filed by securities class action claimants (1.0); confer with A. Padmanabhan re: objection to class proofs of claim (0.2); research re: Musicland factors (0.8) and review case law re: class claim allowance (1.9); review precedent claims objections (0.7); review bar date notice, order, and publication notice (0.5); review correspondence with KCC re: notice procedure (0.4) and KCC affidavit of service (0.1).	S Kaul	6.00	6,360.00
26 October 2023	Review and analyze re: misclassified claims.	L Mezei	1.60	1,632.00
26 October 2023	Review KCC classification of equity claims and comment on same (0.7); correspond with D. Kim re: same (0.1).	P Strom	0.80	768.00
27 October 2023	Correspond with F. He re: vendor claim settlement	R Szuba	0.30	342.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	agreement (0.1); research re: same (0.1); correspond re: same (0.1).			
27 October 2023	Analyze class proofs of claim (0.6) and unsubstantiated claims (0.4); review Ride investor Group complaint (0.6); research re: authorized agent for putative class claims (1.1) and late-filed claims (1.3); draft email to J. Zakia summarizing same (0.5); research re: burden shifting on claims allowance (0.8); draft objection to unsubstantiated and class claims (3.4).	S Kaul	8.70	9,222.00
27 October 2023	Review and analyze re: misclassified claims.	L Mezei	0.80	816.00
29 October 2023	Review precedent objections to Rule 7023 Motions (0.4); research re: facts sufficient for prima facie claims (1.6); analyze class action complaints (0.8); review Disclosure Statement re: securities class claims (0.4); further draft omnibus substantive claims objection (2.7).	S Kaul	5.90	6,254.00
29 October 2023	Review equity claims asserting secured status (0.4); correspond with D. Kim re: same (0.1).	P Strom	0.50	480.00
30 October 2023	Email to J. Zakia (W&C) and R. Kampfner (W&C) re: class claim issues.	D Turetsky	0.10	175.00
30 October 2023	Confer with A. Kroll (Company) and C. Tsitsis (Silverman) re: claim analysis meeting with Committees.	F He	0.30	393.00
30 October 2023	Confer with L. Mezei re: potential claim objections (0.2); analyze preliminary claim objection analysis from company (0.5).	D Kim	0.70	889.00
30 October 2023	Correspond with J. Zakia re: class action defendants (0.2); revise litigation summary chart (0.3); confer with A. Padmanabhan re: unsubstantiated and class proofs of claim (0.4) and preparation of schedules (0.1); further draft omnibus substantive claims objection (1.7).	S Kaul	2.70	2,862.00
31 October 2023	Call with J. Zakia (W&C) re: SEC claim issues.	D Turetsky	0.20	350.00
31 October 2023	Prepare for and participate in call with SEC re: resolution of claim (0.5); pre-call with D. Turetsky re: same (0.1); post-call with D. Turetsky re: same (0.1).	J Zakia	0.70	1,225.00
31 October 2023	Analyze claims analysis from claims agent.	D Kim	0.40	508.00
31 October 2023	Review and analyze hearing transcripts re: claims allowance (0.8) and class claims (1.1).	S Kaul	1.90	2,014.00
31 October 2023	Review KCC classification of 510(b) equity claims.	P Strom	0.70	672.00
<b>SUBTOTAL: Claims Administration &amp; Objections</b>			<b>85.70</b>	<b>98,594.00</b>

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
<b>Corporate Advice &amp; Board Meetings</b>				
9 October 2023	Attend call with AJ Ericksen re: securities issues.	R Kampfner	0.60	954.00
10 October 2023	Emails to D. Ninivaggi (Lordstown) re: board meeting issues.	D Turetsky	0.10	175.00
12 October 2023	Analyze governance questions re: Winston review.	G Pryor	0.40	780.00
13 October 2023	Review minutes.	G Pryor	0.50	975.00
13 October 2023	Review and comment re: September 26 board minutes.	D Turetsky	0.20	350.00
14 October 2023	Draft board presentation re: Plan and Disclosure Statement among other key case items (1.6); review documents re: same, including Plan and Disclosure Statement (0.5); correspond to R. Kampfner and D. Turetsky re: board presentation (0.2); confer with D. Turetsky re: same (0.1).	R Szuba	2.40	2,736.00
15 October 2023	Emails to R. Szuba (W&C) re: board meeting issues.	D Turetsky	0.10	175.00
15 October 2023	Draft board presentation (0.7); review supporting documents in connection with same, including plan (0.5); correspond to D. Turetsky and R. Kampfner re: same (0.2).	R Szuba	1.40	1,596.00
16 October 2023	Further review and comment re: board deck.	D Turetsky	0.30	525.00
16 October 2023	Draft board presentation (0.6); correspond with D. Turetsky and W&C team re: same (0.1).	R Szuba	0.70	798.00
17 October 2023	Prepare for board meeting (0.3); participate in/advise on Lordstown board meeting with Lordstown Board (D. Hamamoto, D. Ninivaggi, E. Hightower, J. Reiss and others), M. Leonard, G. Pryor, D. Turetsky and others (0.8).	T Lauria	1.10	2,310.00
17 October 2023	Preparation for (0.2) and attend board meeting (0.8).	G Pryor	1.00	1,950.00
17 October 2023	Attend Lordstown Board meeting with Lordstown board (D. Hamamoto, E. Hightower, D. Ninivaggi and others), W&C (T. Lauria, G. Pryor, and J. Zakia), and others.	D Turetsky	0.80	1,400.00
17 October 2023	Prepare for (0.2) and participate in board meeting (0.8).	J Zakia	1.00	1,750.00
17 October 2023	Draft board presentation re: Plan, Disclosure Statement, sale process, and solicitation (0.8); correspond to D. Ninivaggi and company re: same (0.2); correspond to R. Kampfner, D. Turetsky and W&C team re: same (0.2).	R Szuba	1.20	1,368.00
<b>SUBTOTAL: Corporate Advice &amp; Board Meetings</b>			<b>11.80</b>	<b>17,842.00</b>

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
<b>Creditor Meetings &amp; Statutory Committees</b>				
2 October 2023	Email to D. Kim (W&C) re: Equity Committee equity trading motion.	D Turetsky	0.10	175.00
2 October 2023	Review and analyze revisions to Equity Committee's trading order (0.1); correspond with D. Turetsky, company, and committee local counsel re: same (0.1).	D Kim	0.20	254.00
2 October 2023	Review responses to Committees re: requested diligence.	R Szuba	0.20	228.00
3 October 2023	Correspond with D. Kovsky re: issue re: amended schedules (0.3); research re: same (0.2); correspond with J. Westwood (KCC) re: same (0.1); correspond to Equity Committee re: Foxconn agreements re: subscription rights and warrants (0.2); research re: same (0.2).	R Szuba	1.00	1,140.00
4 October 2023	Confer with Equity Committee counsel re: case issues.	J Zakia	1.00	1,750.00
<b>SUBTOTAL: Creditor Meetings &amp; Statutory Committees</b>			<b>2.50</b>	<b>3,547.00</b>

**Exclusivity, Plan & Disclosure Statement**

2 October 2023	Call with D. Kovsky (Troutman) re: Plan issues (0.1); call with A. Steele (RLF) re: Plan exclusivity issues (0.1); further analysis re: Plan issues (0.2); call with Brown Rudnick team (B. Silverberg, N. Bouchard, J. Cushing, P. Flink, A. Kasnetz, T. Axelrod) and W&C (D. Dreier, M. Iloegbunam, and R. Szuba) re: Plan/Disclosure Statement issues (0.7); call with R. Kampfner (W&C) re: Plan issues (0.4).	D Turetsky	1.50	2,625.00
2 October 2023	Review Plan comments from Creditors Committee and Equity Committee (0.7); attend call with D. Turetsky re: Plan confirmation issues, including status of preferred (0.4); attend call with Equity Committee counsel (B. Silverberg, N. Bouchard, J. Cushing, others) and W&C team (D. Turetsky, D. Dreier, R. Szuba, others) re: Plan/Disclosure Statement issues (0.7).	R Kampfner	1.80	2,862.00
2 October 2023	Draft Plan issues list (1.5); review and analyze Creditors' Committees proposed Plan revisions (0.9); correspondence to D. Turetsky and R. Kampfner re: same (0.2); call with D. Turetsky, B. Silverberg (Brown Rudnick) and W&C and Brown Rudnick teams re: Plan and Disclosure Statement (0.7); research re: plan exclusivity issues (0.2); correspondence to A. Steele and RLF team re: same (0.2).	R Szuba	3.70	4,218.00
3 October 2023	Call with D. Kovsky (Troutman) re: Plan matters (0.1); review and analysis re: Creditors' Committee/Equity Committee Plan markup (0.4); confer with B. Silverberg (Brown Rudnick) re: Plan issues (0.1); call with R. Szuba (W&C) and R. Kampfner (W&C) re: Plan issues (0.5); emails to D. Kovsky re: Plan/solicitation issues (0.1).	D Turetsky	1.20	2,100.00

**WHITE & CASE**

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
3 October 2023	Review/analysis re: Plan issues (2.1); call with D. Turetsky and R. Szuba to discuss Plan issues (0.5).	R Kampfner	2.60	4,134.00
3 October 2023	Confer with Creditors' Committee re: motion to extend exclusivity (0.1); confer with Equity Committee re: same (0.1).	F He	0.20	262.00
3 October 2023	Analyze revised Disclosure Statement objection status tracker (0.1); review and provide comments to draft motion to extend Debtors' exclusivity periods (0.4).	D Kim	0.50	635.00
3 October 2023	Call re: Plan and Disclosure Statement with D. Turetsky and R. Kampfner (0.5); review comments from Equity Committee to Plan (0.7); draft issues list re: same (0.3); correspond with R. Kampfner and D. Turetsky re: same (0.3); correspond with C. Tsitsis and Silverman team re: liquidation analysis and waterfall (0.2); research re: Plan releases (0.4); correspond to D. Turetsky re: same (0.3); correspond to G. Pryor and W&C corporate, M&A, securities, and tax teams re: Plan and Disclosure Statement (0.5).	R Szuba	3.20	3,648.00
4 October 2023	Email to D. Ninivaggi (Lordstown) re: Plan issues (0.2); review and comment re: motion to extend exclusive period (0.2); email to D. Kovsky (Troutman) re: Plan issues (0.1); calls with R. Kampfner (W&C) re: Plan issues (0.3); call with Lordstown (D. Ninivaggi, E. Hightower, M. Leonard, and A. Kroll) and W&C (R. Kampfner and R. Szuba) re: Plan issues (0.8).	D Turetsky	1.60	2,800.00
4 October 2023	Review liquidation analysis (0.5); review Plan issues, including releases and exculpations (0.4); call with D. Turetsky re: Plan issues (0.3); call with Lordstown (D. Ninivaggi, E. Hightower, M. Leonard, and A. Kroll) and W&C (D. Turetsky, R. Szuba) re: Plan issues (0.8).	R Kampfner	2.00	3,180.00
4 October 2023	Confer with C. Tsitsis (Silverman) re: Plan issues (0.3); research re: same (0.5); confer with R. Szuba re: same (0.3); review exclusivity motion (0.3); confer with J. Madron (RLF) re: same (0.2).	F He	1.60	2,096.00
4 October 2023	Review and revise draft ballots and notices for general unsecured class (0.4); review revised draft of order approving Disclosure Statement (0.2); correspond with L. Mezei re: same (0.1); confer with F. He re: draft reply in support of Disclosure Statement motion (0.1).	D Kim	0.80	1,016.00
4 October 2023	Analysis re: plan issues/questions from company (0.2); draft email to D. Turetsky and R. Kampfner re: same (0.1); correspond with D. Turetsky re: risk factors for Disclosure Statement (0.1); attend call with D. Ninivaggi, M. Leonard, R. Kampfner, and D. Turetsky re: Plan and Disclosure Statement (0.8); revise Plan (1.9); revise Disclosure Statement (2.2); analyze comments to Plan and Disclosure Statement of United States Trustee (0.8).	R Szuba	6.10	6,954.00
5 October 2023	Calls with B. Silverberg (Brown Rudnick) re: Plan issues (0.5); further analysis re: Plan liquidation	D Turetsky	3.00	5,250.00

**WHITE & CASE**

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	analysis issues (0.6); call with D. Ninivaggi (Lordstown) re: Plan issues (0.1); further review and comment re: Lordstown Plan (1.7); further call with R. Kampfner (W&C) and R. Hamilton (W&C) re: Plan issues (0.1).			
5 October 2023	Continue review/comment re: liquidation analysis (0.7); further analysis of Plan issues (0.2); call with R. Szuba and Silverman team re: liquidation analysis (0.6).	R Kampfner	1.50	2,385.00
5 October 2023	Call with R. Kampfner and Silverman team re: liquidation analysis (0.6); attention to issues re: same (0.4); research re: liquidation analysis issues (1.5); research re: post-petition interest rate issue for Plan (0.3); correspond to B. Silverberg and Equity Committee counsel re: Creditors' Committee comments to Plan and Disclosure Statement (0.3); review Creditors' Committee comments to Plan and Disclosure Statement (0.3); correspond with D. Turetsky and R. Kampfner re: same (0.2); review D. Turetsky comments to Plan and Disclosure Statement (0.3); further draft Plan (0.6) and Disclosure Statement (0.8); draft issues list re: Plan and Disclosure Statement (0.2).	R Szuba	5.50	6,270.00
6 October 2023	Email to R. Hamilton (Jefferies) re: Plan issues (0.1); call with Brown Rudnick (R. Stark, B. Silverberg, M. Winograd), M3 (R. Winning), and W&C (R. Kampfner, R. Szuba, and J. Zakia) re: Plan issues (1.7); call with B. Hackman (US Trustee) re: Disclosure Statement issues (0.2); call with D. Ninivaggi (Lordstown) re: Disclosure Statement issues (0.1); email to B. Hackman (US Trustee) re: Disclosure Statement issues (0.1); call with D. Kovsky (Troutman) re: Plan issues (0.2); call with J. Zakia (W&C) re: Plan issues (0.1); review SEC Disclosure Statement objection (0.2); further analysis re: Plan issues (0.3); calls with R. Kampfner (W&C) re: Disclosure Statement/Plan issues (0.5); further call with B. Silverberg (Brown Rudnick) re: Plan issues (0.6).	D Turetsky	4.10	7,175.00
6 October 2023	Confer with Equity Committee counsel (R. Stark, B. Silverberg, M. Winograd) re: Plan terms (1.7); review Disclosure Statement objections (1.3).	J Zakia	3.00	5,250.00
6 October 2023	Attend call with Equity Committee (R. Stark, B. Silverberg, M. Winograd, R. Winning) and W&C (D. Turetsky, R. Szuba, J. Zakia) re: Plan issues (1.7); attend call with Silverman re: liquidation analysis (0.5); several calls with D. Turetsky re: Plan/Disclosure Statement issues (0.5); review NOL issues in connection with Plan (0.7).	R Kampfner	3.40	5,406.00
6 October 2023	Review and analyze objections to Disclosure Statement (0.8); correspond with L. Mezei, F. He re: draft reply in support of Disclosure Statement motion (0.2); analyze revisions to first amended Plan (0.3).	D Kim	1.30	1,651.00
6 October 2023	Call with counsel to Equity Committee, D. Turetsky, and R. Kampfner re: Plan and Disclosure Statement	R Szuba	6.50	7,410.00



LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.5); draft chapter 11 Plan with attention to Equity Committee comments (2.5); review documents relevant to same (0.5); correspond to R. Kampfner and D. Turetsky re: liquidation analysis (0.3); draft Plan provision on liquidation trust (0.2); review comments to Plan and Disclosure Statement from Creditors' Committee (0.6); draft Disclosure Statement, including with attention to Equity Committee and Creditors' Committee comments (1.9).			
6 October 2023	Draft Disclosure Statement reply.	L Mezei	3.70	3,774.00
6 October 2023	Review/prepare summary chart re: Disclosure Statement objections.	P Strom	2.90	2,784.00
7 October 2023	Further analysis re: waterfall/liquidation analysis issues (0.2); review and analysis of Ohio Claimants' Disclosure Statement objection (0.8); review and analysis re: Delaware Claimants' Disclosure Statement objection (0.4); calls with R. Kampfner (W&C) re: Plan/Disclosure Statement issues (0.8); review and analysis re: Foxconn Disclosure Statement objection (0.7); review RIDE claimants' objection to Disclosure Statement (0.5); review SEC Disclosure Statement objection (0.2); email to R. Szuba (W&C) re: Disclosure Statement objection issues (0.1).	D Turetsky	3.70	6,475.00
7 October 2023	Calls with D. Turetsky re: Plan/Disclosure Statement issues.	R Kampfner	0.80	1,272.00
7 October 2023	Analyze and further revise draft objection reply chart.	D Kim	0.30	381.00
7 October 2023	Revise Disclosure Statement (0.3); correspond with D. Turetsky re: Disclosure Statement objections (0.1).	R Szuba	0.40	456.00
7 October 2023	Further draft Disclosure Statement reply (3.2); update Disclosure Statement order (2.2).	L Mezei	5.40	5,508.00
8 October 2023	Emails to R. Kampfner (W&C) re: open Disclosure Statement issues (0.3); further/research analysis re: responses to Disclosure Statement objections (0.7); emails to R. Szuba (W&C) re: Disclosure Statement objection issues (0.1); call with D. Ninivaggi (Lordstown) re: Plan/Disclosure Statement issues and objection (0.6).	D Turetsky	1.70	2,975.00
8 October 2023	Revise Plan, including to address Disclosure Statement objections (0.7); revise Disclosure Statement re: Disclosure Statement objections (2.4); research re: same (0.9); draft Disclosure Statement issues list (0.5); draft correspondence to R. Kampfner and D. Turetsky re: Plan and Disclosure Statement (0.3).	R Szuba	4.80	5,472.00
8 October 2023	Update Disclosure Statement order and exhibits.	L Mezei	4.20	4,284.00
9 October 2023	Email to A. Ericksen (W&C) re: securities issues re: chapter 11 Plan (0.1); call with B. Silverberg (Brown	D Turetsky	3.00	5,250.00



LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Rudnick) re: Plan/Disclosure Statement issues (0.4); call with D. Kovsky (Troutman) re: Plan issues (0.2); review and comment re: Disclosure Statement (0.8); further calls with R. Kampfner (W&C) re: Plan issues (0.9); call with A. Ericksen (W&C) and R. Kampfner (W&C) re: Disclosure Statement issues (0.6).			
9 October 2023	Review Disclosure Statement objections (0.7); confer with D. Turetsky re: same (0.5).	J Zakia	1.20	2,100.00
9 October 2023	Further review waterfall analysis (0.4); review Plan and Disclosure Statement issues (0.7); calls with D. Turetsky re: Plan issues (0.9).	R Kampfner	2.00	3,180.00
9 October 2023	Review and analyze revised order approving Disclosure Statement (0.6); correspond with L. Mezei re: same (0.1).	D Kim	0.70	889.00
9 October 2023	Correspond with C. Tsitsis and Silverman team re: liquidation analysis and waterfall (0.3); review correspondence from D. Turetsky re: Disclosure Statement (0.2); revise Disclosure Statement (1.3); correspond to D. Kim and L. Mezei re: solicitation issues re: Disclosure Statement (0.2).	R Szuba	2.00	2,280.00
9 October 2023	Further draft Disclosure Statement reply.	L Mezei	5.20	5,304.00
10 October 2023	Call with B. Silverberg (Brown Rudnick) re: Plan issues (0.3); further analysis re: Disclosure Statement issues (0.3); review Creditors' Committee Plan comments (0.2); email to R. Szuba (W&C) re: same (0.1); call with J. Spreen (Baker), B. Stevenson (Baker), A. Ericksen (W&C), and R. Kampfner (W&C) re: Plan/reporting issues (0.8); calls with R. Kampfner (W&C) re: Plan issues (0.7); call with F. Lawall (Troutman) and D. Kovsky (Troutman) re: Plan issues (0.3); call with Silverman (D. Tsitsis, E. Hammes, S. Kohler), R. Kampfner (W&C) and R. Szuba (W&C) re: Disclosure Statement waterfall matters (0.8); further research/analysis re: Plan release issues (0.5).	D Turetsky	4.00	7,000.00
10 October 2023	Attend (partial) call with Silverman (C. Tsitsis, E. Hammes), D. Turetsky, R. Szuba re: liquidation analysis (0.6); calls with D. Turetsky re: Plan issues (0.7); attend call with Baker (J. Spreen) re: status of public shares post-effective date (0.5).	R Kampfner	1.80	2,862.00
10 October 2023	Call with C. Tsitsis, E. Hammes, D. Turetsky, and R. Kampfner re: liquidation analysis and Disclosure Statement (0.8); revise Disclosure Statement (3.5); confer with R. Kampfner re: Committees comments to Plan (0.4); revise solicitation procedures order (0.2) and solicitation procedures (0.3); correspond with L. Mezei re: same (0.2); correspond to D. Dreier and M. Iloegbunam re: Disclosure Statement tax disclosures (0.2); correspond to A. Kroll re: Disclosure Statement employee disclosures (0.2).	R Szuba	5.80	6,612.00
10 October 2023	Continue draft Disclosure Statement reply.	L Mezei	3.80	3,876.00

**WHITE & CASE**

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
11 October 2023	Review and analysis re: Equity Committee Plan comments (0.4); emails to R. Szuba (W&C) re: Plan issues (0.1); call with D. Ninivaggi (Lordstown) re: Plan issues (0.1); call with B. Silverberg (Brown Rudnick) re: Plan issues (0.4); call with D. Kovsky (Troutman) re: Plan issues (0.2); further calls with R. Kampfner (W&C) re: Plan issues (0.2); further analysis re: Plan waterfall issues (0.2); call with R. Kampfner (W&C), R. Szuba (W&C), and (partial) Brown Rudnick (R. Stark and B. Silverberg) re: Plan issues (1.3); further analysis re: Plan issues (0.4); call with W&C (M. Illegbunam, D. Dreier, and R. Szuba) re: tax issues re: Plan (0.3).	D Turetsky	3.60	6,300.00
11 October 2023	Attend call with Brown Rudnick (B. Silverberg) re: Plan issues (1.0); work on Plan drafting (1.6); calls with D. Turetsky re: Plan issues (0.2).	R Kampfner	2.80	4,452.00
11 October 2023	Review and revise draft ballots based on Disclosure Statement.	D Kim	0.30	381.00
11 October 2023	Call with R. Kampfner, D. Turetsky and W&C tax team re: Disclosure Statement tax provisions (0.5); review Equity Committee comments to Plan and Disclosure Statement (0.3); revise Disclosure Statement (0.2); correspond to R. Kampfner re: Plan and Disclosure Statement (0.2); review Plan and Disclosure Statement provisions re: treatment of Foxconn preferred stock and section 510(b) claims (0.4); draft email to G. Pryor, A. Ericksen, and A. Cieply re: same (0.5); correspond with L. Mezei re: Disclosure Statement reply (0.2); review same (0.3).	R Szuba	2.60	2,964.00
12 October 2023	Emails to F. Lawall (Troutman) and D. Kovsky (Troutman) re: Plan/Disclosure Statement matters (0.1); calls with R. Kampfner (W&C) re: Plan matters (0.5); call with R. Hamilton (Jefferies) R. Kampfner (W&C) re: Plan issues (0.8); call with D. Ninivaggi (Lordstown) re: Plan issues (0.1); further analysis re: Plan issues (0.8); further analysis re: Disclosure Statement issues (0.5).	D Turetsky	2.80	4,900.00
12 October 2023	Incorporate comments from Equity Committee and Creditors Committee into Plan (1.6); review and revise Disclosure Statement re: same (1.1); review liquidation analysis (0.5); calls with D. Turetsky re: Plan matters (0.5); call with R. Hamilton (Jefferies), D. Turetsky re: Plan issues (0.8).	R Kampfner	4.50	7,155.00
12 October 2023	Correspond with R. Kampfner re: Plan and Equity Committee comments (0.2); draft first amended Disclosure Statement (1.4); draft first amended Plan, including incorporation of Creditors' Committee comments (1.7); correspond to D. Turetsky and R. Kampfner re: same (0.4); correspond to M. Leonard, others at company, J. Zakia and W&C team re: derivative oversight committee for Disclosure Statement updates (0.3); review materials re: same (0.2); correspond with J. Spreen (Baker) re: latest Plan and Disclosure Statement (0.2); correspond to P. Strom re: equity impairment research (0.1); call with P.	R Szuba	4.70	5,358.00

**WHITE & CASE**

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	Strom re: same (0.2).			
13 October 2023	Review of revised Plan (0.5) and Disclosure Statement (0.7).	G Pryor	1.20	2,340.00
13 October 2023	Calls with R. Kampfner (W&C) re: Plan issues (0.8); further review and comment re: Lordstown chapter 11 Plan (1.2); calls with J. Zakia (W&C) re: Plan issues (0.1); calls with D. Ninivaggi (Lordstown) re: Plan issues (0.6); call with B. Silverberg (Brown Rudnick) re: Plan issues (0.3); call with D. Kovsky (Troutman) re: Plan issues (0.3).	D Turetsky	3.30	5,775.00
13 October 2023	Conduct analysis of Plan issues, including treatment of 510(b) claims (1.2) and releases (0.5); calls with D. Turetsky re: Plan issues (0.8); call with R. Szuba re: 510(b) treatment (0.2).	R Kampfner	2.70	4,293.00
13 October 2023	Draft first amended Plan and Disclosure Statement (0.9); correspond to D. Turetsky and R. Kampfner re: same (0.5); call with R. Kampfner re: 510(b) treatment (0.2); correspond to R. Kampfner re: same (0.1); correspond to A. Ericksen re: Plan (0.1).	R Szuba	1.80	2,052.00
14 October 2023	Calls with R. Kampfner (W&C) re: Plan issues (0.7); email to D. Ninivaggi (Lordstown) re: Plan issues (0.1); further analysis re: Plan issues (0.3); calls with D. Ninivaggi (Lordstown) re: Plan issues (2.2); emails to D. Kovsky (Troutman) re: Plan issues (0.1); further review and comment re: Plan (1.2).	D Turetsky	4.60	8,050.00
14 October 2023	Review and revise Plan re: class treatment (1.3); calls with D. Turetsky re: Plan Issues (0.7).	R Kampfner	2.00	3,180.00
14 October 2023	Analyze draft CNO re: Debtors' exclusivity motion.	D Kim	0.10	127.00
14 October 2023	Correspond to R. Kampfner and D. Turetsky re: equity impairment analysis (0.2); review research re: same (0.2).	R Szuba	0.40	456.00
15 October 2023	Call with D. Turetsky re: Plan strategy issues (0.3); further attention to Plan strategy issues (0.2).	T Lauria	0.50	1,050.00
15 October 2023	Further review and comment re: Plan (1.3); email to R. Kampfner (W&C) re: Plan issues (0.1); calls with R. Kampfner (W&C) re: Plan issues (0.8); calls with D. Ninivaggi (Lordstown) re: Plan issues (0.9); call with J. Zakia (W&C) re: Plan issues (0.1); call with T. Lauria (W&C) re: Plan issues (0.3); call with R. Szuba (W&C) re: Plan issues (0.1); emails to R. Szuba (W&C) re: Plan release issues (0.1); research re: Plan release issues (1.0); email to T. Lauria (W&C) re: Plan release issues (0.2).	D Turetsky	4.90	8,575.00
15 October 2023	Analysis of new treatment for class action claimants (0.9); various calls with D. Turetsky re: revised Plan (0.8); review and revise Plan (1.0).	R Kampfner	2.70	4,293.00

**WHITE & CASE**

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
15 October 2023	Confer with D. Turetsky re: release issue (0.2); research re: releases for equity classes (1.6); draft analysis to D. Turetsky re: same (0.3); correspond to Creditors' Committee and Equity Committee re: Plan and Disclosure Statement (0.2).	R Szuba	2.30	2,622.00
16 October 2023	Calls with D. Turetsky re: Plan issues (0.8); analysis re: Plan strategy issues (1.3).	T Lauria	2.10	4,410.00
16 October 2023	Analyze questions re: treatment of preferred equity holders in Plan resolution (0.9); review of related background memos in connection with same (0.6).	G Pryor	1.50	2,925.00
16 October 2023	Email to J. Zakia (W&C) and R. Kampfner (W&C) re: Plan issues (0.1); calls with J. Zakia (W&C) re: Plan issues (0.4); call with B. Silverberg re: Plan issues (0.3); further analysis re: Plan issues (0.9); call with Brown Rudnick (B. Silverberg, M. Sawyer, P. Flink) and Morris James re: Plan issues (0.8); calls with T. Lauria (W&C) re: Plan issues (0.8); call with D. Ninivaggi (Lordstown) re: liquidation analysis issues (0.2); further analysis re: waterfall/liquidation analysis issues (0.4); further call with J. Zakia (W&C) and R. Kampfner (W&C) re: Plan issues (0.3); call with R. Winning (M3) re: waterfall issues (0.3); further call with R. Kampfner (W&C), R. Winning (M3), and B. Silverberg (Brown Rudnick) re: Plan issues (0.9); further call with R. Kampfner (W&C) re: Plan issues (0.6); review and comment re: liquidation analysis (0.4); further research re: Plan treatment issues (0.9).	D Turetsky	7.30	12,775.00
16 October 2023	Confer with D. Turetsky re: plan strategy issues (0.4); further call with D. Turetsky and R. Kampfner re: plan issues (0.3); review revised Plan (0.9); confer with D. Turetsky re: plan issues (0.4).	J Zakia	2.00	3,500.00
16 October 2023	Review treatment of preferred shares in Plan (1.5); review treatment of section 510(b) claims (1.6); review and revise other Plan provisions (0.7); call with J. Zakia and D. Turetsky re: Plan issues (0.3); call with D. Turetsky, R. Winning and B. Silverberg re: Plan issues (0.9); further call with D. Turetsky re: Plan issues (0.6).	R Kampfner	5.60	8,904.00
16 October 2023	Review solicitation motion (0.5); research re: solicitation timeline (0.5); correspond to L. Mezei re: same (0.3); review Plan comments from Equity Committee (0.6); draft issues chart re: same (0.7); confer with R. Kampfner re: same (0.2); draft liquidation analysis narrative (1.1); review footnotes to liquidation analysis (0.3); correspond with R. Kampfner and D. Turetsky re: same (0.3); draft Plan, including re: Equity Committee comments (1.1).	R Szuba	5.60	6,384.00
17 October 2023	Call with D. Ninivaggi re: Plan strategy issues (0.2); further attention to Plan strategy issues (0.6); email to D. Turetsky, J. Zakia, and R. Kampfner re: Plan issues (0.2); meet with D. Turetsky re: Plan strategy issues (0.3).	T Lauria	1.30	2,730.00
17 October 2023	Call with D. Ninivaggi (Lordstown) re: Plan issues	D Turetsky	1.40	2,450.00

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RE: Project Pickup

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DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.1); calls with R. Kampfner (W&C) re: Plan issues (0.4); email to A. Kroll (Lordstown) re: liquidation/waterfall analysis (0.1); further analysis re: Plan issues (0.6); calls with D. Ninivaggi (Lordstown) re: Plan issues (0.2).			
17 October 2023	Attend call with B. Silverberg re: treatment of 510(b) claims (0.8); attend call with D. Kovsky (UCC), B. Silverberg (EC), and R. Szuba re: Plan comments (1.0); review and revise Plan (3.1); call with R. Szuba re: board presentation (0.4); calls with D. Turetsky re: Plan issues (0.4); call with D. Turetsky re: sale issues (0.1).	R Kampfner	5.80	9,222.00
17 October 2023	Review preliminary draft of reply in support of Disclosure Statement (0.4); review and revise certain ballots and notices to Disclosure Statement order (0.6); correspond with L. Mezei, F. He re: same (0.1); review revised draft of Plan in connection with ballots issues (0.3).	D Kim	1.40	1,778.00
17 October 2023	Correspond to Katten (counsel to current D&Os) re: Disclosure Statement (0.2); draft Disclosure Statement (0.8); attend call with D. Kovsky (Creditors' Committee), B. Silverberg (Equity Committee), and R. Kampfner re: Plan (1.0); draft Plan (0.5); correspond to D. Turetsky and R. Kampfner re: Plan and Disclosure Statement (0.3); correspond with counsel to Creditors' Committee and Equity Committee re: Plan and Disclosure Statement (0.1); correspond with L. Mezei re: solicitation motion (0.2); review correspondence with A. Erikson and G. Pryor re: treatment of preferred (0.2); correspond with D. Turetsky re: solicitation process (0.2); review correspondence from KCC re: same (0.1).	R Szuba	3.60	4,104.00
18 October 2023	Calls with B. Silverberg (Brown Rudnick) re: Plan issues (0.4); further analysis re: Plan issues (0.4); calls with R. Kampfner (W&C) re: Plan issues (0.8) and waterfall analysis for Disclosure Statement (0.1); call with R. Hamilton (Jefferies) re: Plan issues (0.2); call with D. Kim (W&C) and R. Kampfner (W&C) re: Plan solicitation issues (0.4); call with Silverman (S. Koehler, E. Hammes) and R. Kampfner (W&C) re: waterfall analysis (0.5); call with D. Kovsky (Troutman) re: Plan issues (0.4).	D Turetsky	3.20	5,600.00
18 October 2023	Attend call re: liquidation analysis with Silverman (S. Koehler, E. Hammes) and D. Turetsky (0.5); revise Plan per comments from Equity Committee and Creditors' Committee (2.1); call with R. Szuba re: Disclosure Statement reply (1.0); call with D. Turetsky re: Plan issues (0.8) and waterfall analysis for Disclosure Statement (0.1); call with D. Kim and D. Turetsky re: Plan solicitation issues (0.4).	R Kampfner	4.90	7,791.00
18 October 2023	(Partial) call with D. Turetsky, R. Kampfner, D. Kim and R. Szuba re: plan issues and strategy (0.6); call with R. Szuba and D. Kim re: various Plan, Disclosure Statement, solicitation issues (0.7); call with R. Kampfner, R. Szuba and D. Kim re: Disclosure	F He	2.60	3,406.00

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	Statement objection reply (1.3).			
18 October 2023	Call with F. He, R. Kampfner, D. Turetsky, and R. Szuba re: Plan and solicitation issues and related case strategy (1.0); review revised Plan (0.7); analyze potential changes to Disclosure Statement and solicitation materials (0.4); call with R. Kampfner, D. Turetsky re: revised solicitation procedures and Plan voting issues (0.4).	D Kim	2.50	3,175.00
18 October 2023	Attend call with R. Kampfner, F. He, and D. Turetsky re: plan issues and strategy (1.0); call with F. He and D. Kim re: solicitation (0.7); correspond to Committees re: Plan (0.2); review Plan (0.3); call with R. Kampfner re: Disclosure Statement reply (1.0); research re: 510(b) ballots (0.5); correspond to L. Mezei re: solicitation package (0.2).	R Szuba	3.90	4,446.00
19 October 2023	Calls with R. Kampfner (W&C) re: Plan issues (0.7) and Disclosure Statement matters (0.2); calls with B. Silverberg (Brown Rudnick) and R. Kampfner (W&C) re: Plan issues (0.7); call with R. Szuba (W&C) re: Plan issues (0.1); calls with D. Ninivaggi (Lordstown) re: Plan issues (1.2); calls with J. Zakia (W&C) re: Plan issues (0.2); further calls with B. Silverberg (Brown Rudnick) re: Plan issues (0.2); further review and comment re: Plan (0.9); further analysis re: Plan issues (0.7); further review and comment re: liquidation analysis (0.3); email to E. Hammes (Silverman) re: same (0.1).	D Turetsky	5.30	9,275.00
19 October 2023	Review revised Plan (1.7); confer with D. Turetsky re: plan matters (0.2); confer with client re: Plan (0.8); confer with directors' counsel re: Plan (1.0); prepare for and confer with DE counsel re: claims subordination (0.5).	J Zakia	4.20	7,350.00
19 October 2023	Analysis re: plan issues raised by Equity Committee and Creditors' Committee (1.1); review liquidation analysis revisions (0.4); review treatment of 510(b) claimants (0.5); review Disclosure Statement (1.1); review solicitation procedures (0.4); calls with D. Turetsky re: Plan issues (0.7) and Disclosure Statement matters (0.2); calls with B. Silverberg (BR) and D. Turetsky re: Plan issues (0.7).	R Kampfner	5.10	8,109.00
19 October 2023	Call with D. Turetsky, R. Kampfner, D. Kim and R. Szuba re: plan issues and strategy (0.6); review and revise Disclosure Statement reply brief (2.9); confer with R. Szuba re: same (0.3); confer with R. Szuba and D. Kim re: various Plan and solicitation issues (0.7).	F He	4.50	5,895.00
19 October 2023	Call with R. Kampfner, F. He, R. Szuba re: Plan and solicitation matters and strategy (1.0); call with F. He and R. Szuba to discuss tasks for same (0.6); review revised order approving Disclosure Statement (0.6); analyze draft ballots for new voting classes (0.6); correspond with R. Szuba re: same (0.1).	D Kim	2.90	3,683.00

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19 October 2023	Attend case strategy call with D. Turetsky, R. Kampfner, D. Kim, and F. He, including Plan and Disclosure Statement and solicitation planning (1.0); call with F. He and D. Kim regarding solicitation and Plan issues; (0.6); call with M. Sawyer (Equity Committee) re: Disclosure Statement (0.1); correspond with counsel to D&Os re: relevant Disclosure Statement excerpt (0.2); correspond to L. Mezei re: solicitation of 510(b) classes (0.3); research re: same (0.7); correspond with D. Turetsky and R. Kampfner re: same (0.2); correspond to A. Estrada and KCC team re: latest Plan and Disclosure Statement and solicitation plan (0.6); revise draft chart to be attached to Disclosure Statement motion reply re: objection resolutions and responses (1.8); confer with F. He re: same (0.2); correspondence with counsel to directors and officers in prepetition litigation (0.2); correspond with R. Kampfner, D. Turetsky, and J. Zakia re: same (0.1); correspond with R. Kampfner re: indemnification obligations provision in Plan and Disclosure Statement (0.1); correspond with R. Kampfner and D. Turetsky re: rejection provision in Plan and Disclosure Statement (0.1); further revise plan (2.5) and disclosure statement (2.1) in connection with comments received/in response to objections.	R Szuba	10.80	12,312.00
19 October 2023	Update solicitation procedures and exhibits.	L Mezei	4.70	4,794.00
20 October 2023	Further attention to Plan strategy matters (0.9); email to D. Turetsky re: same (0.1).	T Lauria	1.00	2,100.00
20 October 2023	Calls with D. Detweiler (Womble) re: Plan/Disclosure Statement issues (0.2); calls with J. Zakia (W&C) re: Plan issues (0.4); calls with B. Silverberg (Brown Rudnick), (partial) R. Stark (Brown Rudnick) and R. Kampfner (W&C) re: Plan issues (0.9); calls with D. Kovsky (Troutman) re: Plan issues (0.6); further calls with R. Kampfner (W&C) re: Plan issues (0.5) and Disclosure Statement/liquidation analysis issues (0.6); calls with D. Ninivaggi (Lordstown) re: Plan issues (0.3); emails to D. Detweiler (Womble) re: Plan issues (0.1); email to B. Silverberg (Brown Rudnick) re: Plan issues (0.5); call with E. Hammes (Silverman) and D. Tsitsis (Silverman) re: claims waterfall (0.3); further calls with B. Silverberg (Brown Rudnick) re: Plan issues (0.8); review and comment re: liquidation analysis (0.3); emails to E. Hammes (Silverman) re: claims waterfall issues (0.1); email to F. Lawall (Troutman), D. Kovsky (Troutman), B. Silverberg (Brown Rudnick), and R. Stark (Brown Rudnick) re: Plan settlement (0.3).	D Turetsky	5.90	10,325.00
20 October 2023	Confer with D. Turetsky re: Plan issues (0.4); review liquidation analysis (0.2).	J Zakia	0.60	1,050.00
20 October 2023	Review and revise Plan to incorporate Equity Committee and Creditors' Committee comments (1.7); call with B. Silverberg re: same (0.5); review Disclosure Statement (2.6).	R Kampfner	4.80	7,632.00
20 October 2023	Research (1.4), draft/ revise reply to Disclosure	F He	6.70	8,777.00



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	Statement objections (3.9); call with A. Estrada, K. Martin, J. Ngo, K. Martin (KCC), R. Szuba, and D. Kim (0.5); further call with R. Szuba re: Disclosure Statement reply (0.4); confer with S. Kohler re: Plan issues (0.3); analyze and confer with D. Kim solicitation issues (0.2).			
20 October 2023	Analyze and provide comments to draft Disclosure Statement reply chart (0.3); review and revise draft Disclosure Statement order (0.6); review and revise draft ballots (0.8); review and revise draft non-voting notices and election (0.4); confer with F. He, R. Szuba, L. Mezei re: same (0.2); review and revise draft solicitation procedures (0.6).	D Kim	2.90	3,683.00
20 October 2023	Call with F. He re: Disclosure Statement Motion reply (0.4); review Disclosure Statement motion reply (0.4); further draft chart re: addressing Disclosure Statement objections (2.7); review Plan and Disclosure Statement provisions relevant to same (0.8); review objections to Disclosure Statement motion (1.9); correspond to R. Kampfner and D. Turetsky re: Plan and Disclosure Statement (0.4); draft Disclosure Statement (0.8); review correspondence from Committees re: Plan (0.4); call with A. Estrada, K. Martin, J. Ngo, K. Martin (KCC), F. He, and D. Kim (0.5); attention to issues re: solicitation Plan (0.3); correspond to L. Mezei re: solicitation issues (0.2); correspond to committees re: amended Disclosure Statement and liquidation analysis (0.3).	R Szuba	9.10	10,374.00
20 October 2023	Continue update solicitation procedures and exhibits.	L Mezei	2.10	2,142.00
21 October 2023	Calls with B. Silverberg (Brown Rudnick) re: Plan issues (0.1); call with D. Tsitsis (Silverman) and J. Zakia (W&C) re: liquidation analysis (0.1); calls with R. Kampfner (W&C) re: Plan issues (0.3); further calls with J. Zakia (W&C) re: Plan issues (0.2); calls with D. Ninivaggi (Lordstown) re: Plan issues (0.2); call with M. Leonard (Lordstown) re: Disclosure Statement issues (0.1); calls with R. Szuba (W&C) re: Disclosure Statement issues (0.3); further review and comment re: Disclosure Statement (3.7); emails to J. Zakia (W&C) re: Disclosure Statement issues (0.1); emails to D. Ninivaggi (Lordstown) and M. Leonard (Lordstown) re: Disclosure Statement issues (0.1).	D Turetsky	5.20	9,100.00
21 October 2023	Review draft Plan and Disclosure Statement (2.1); calls with D. Turetsky re: same (0.2); review liquidation analysis (0.1); confer with C. Tsitsis and D. Turetsky re: same (0.1).	J Zakia	2.50	4,375.00
21 October 2023	Review and revise Plan (1.3); call with D. Turetsky re: Plan issues (0.3).	R Kampfner	1.60	2,544.00
21 October 2023	Review and revise (4.4) reply to Disclosure Statement objections; calls with D. Kim re: same (0.2); confer with R. Szuba re: same (0.2).	F He	4.80	6,288.00
21 October 2023	Review and revise solicitation procedures (0.5); review	D Kim	2.90	3,683.00



**WHITE & CASE**

LORDSTOWN MOTORS CORP.

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	and revise draft ballots (1.0); review revised draft notices and other parts of solicitation packages (0.9); calls with L. Mezei, F. He re: same (0.2); revise Disclosure Statement order (0.2); circulate same to D. Turetsky, R. Kampfner and team (0.1).			
21 October 2023	Revise solicitation materials, with attention to company support letter and Plan supplement notice (0.6); correspond with D. Kim and L. Mezei re: same (0.2); correspond with D. Turetsky re: various plan/disclosure statement issues (0.4); draft Plan and Disclosure Statement provisions re: releases and derivative claim investigation (1.1); correspond with D. Turetsky and J. Zakia re: same (0.2); review liquidation analysis (0.5); further correspond to D. Turetsky, J. Zakia and R. Kampfner re: liquidation analysis (0.3); correspond with E. Hammes and Silverman team re: same (0.2); correspond with B. Silverberg re: Class 9 treatment (0.2); confer with R. Kampfner re: same (0.2); draft Plan and Disclosure Statement including re: class 9 treatment and related provisions (1.5); correspond with F. He re: reply (0.2); review reply in support of Disclosure Statement motion (0.3).	R Szuba	5.90	6,726.00
21 October 2023	Draft election form (1.7) and update ballots (1.6).	L Mezei	3.30	3,366.00
22 October 2023	Multiple calls with R. Kampfner (W&C) re: Plan issues (0.6); multiple calls with J. Zakia (W&C) re: Plan issues (0.2); emails to R. Szuba (W&C) re: Plan issues (0.2); calls with D. Kovsky (Troutman) re: Plan issues (0.2); email to D. Kovsky (Troutman) re: Plan issues (0.1); calls with R. Szuba (W&C) re: Disclosure Statement issues (0.8); calls with D. Ninivaggi (Lordstown) re: Plan issues (0.5); call with B. Silverberg (Brown Rudnick), R. Winning (M3), (partial) D. Tsitsis (Silverman) and (partial) R. Kampfner (W&C) re: Disclosure Statement issues (1.1); further calls with B. Silverberg (Brown Rudnick) re: Plan issues (0.3); further review and comment re: liquidation analysis (0.3); further call with R. Kampfner (W&C) and J. Zakia (W&C) re: Plan issues (0.4); review and comment re: response in support of Disclosure Statement (2.1); review and comment re: Disclosure Statement reply argument chart (0.6); further review and comment re: Disclosure Statement (0.7); further review and comment re: Plan (0.6).	D Turetsky	8.70	15,225.00
22 October 2023	Calls with D. Turetsky re: Plan issues (0.4); further analysis re: plan litigation issues (1.1).	J Zakia	1.50	2,625.00
22 October 2023	Review and revise reply to Disclosure Statement objections (1.2); review case law re: inclusion of creditor letters in solicitation packages (0.4); review and revise Disclosure Statement inserts (0.5); multiple calls with D. Turetsky re: Plan issues (0.6); call with B. Silverberg (Brown Rudnick), R. Winning (M3), (partial) D. Tsitsis (Silverman) and D. Turetsky (W&C) re: Disclosure Statement issues (1.1); further call with D. Turetsky and J. Zakia re: Plan issues (0.4); confer with F. He re: reply issues (0.4).	R Kampfner	4.60	7,314.00

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22 October 2023	Confer with P. Strom and L. Mezei re: research for Disclosure Statement reply (0.6); revise reply chart for Disclosure Statement reply (2.1); review research re: Disclosure Statement reply (0.8); confer with R. Kampfner re: reply issues (0.4); confer with M. Paterson (WBD) re: same (0.3).	F He	4.20	5,502.00
22 October 2023	Review/revise reply in support of Disclosure Statement (0.6); analyze research for same (0.7); review and draft Class 10 election notice (0.6); review and revise ballots for voting classes (0.8); correspond with L. Mezei re: same (0.1).	D Kim	2.80	3,556.00
22 October 2023	Correspond to A. Machala (Winston) re: Disclosure Statement provisions re: Winston and derivative claims (0.2); correspond to D. Ninivaggi and company re: company support letter for Plan and Disclosure Statement (0.3); revise company support letter (0.2); correspond to E. Hammes, Silverman team, and company re: liquidation analysis (0.7); review liquidation analysis (0.5); confer with D. Turetsky re: same (0.2); correspond to D. Turetsky, R. Kampfner, and J. Zakia re: liquidation analysis (0.3); draft liquidation analysis narrative for Disclosure Statement (0.2); correspond with M. Patterson and D. Detweiler (Womble) re: Plan and Disclosure Statement filing (0.3); further draft Disclosure Statement (3.9); draft and review Plan (0.7); correspond to R. Kampfner and D. Turetsky re: Disclosure Statement (0.2); draft emails to Creditors' Committee and Equity Committee re: Plan and Disclosure Statement (0.2); correspond with B. Silverberg re: Plan overview in Disclosure Statement (0.2); confer with F. He re: Disclosure Statement motion reply chart (0.2); correspond with D. Kim and L. Mezei re: same (0.5).	R Szuba	8.80	10,032.00
22 October 2023	Research re: consensual release issues (2.4); continue draft re: election form (0.9).	L Mezei	3.30	3,366.00
22 October 2023	Research re: third party release issues (1.9); correspond with F. He and L. Mezei re: same (0.3).	P Strom	2.20	2,112.00
23 October 2023	Further attention re: Plan strategy issues.	T Lauria	0.40	840.00
23 October 2023	Emails to D. Ninivaggi (Lordstown) re: Disclosure Statement issues (0.1) and Plan issues (0.2); calls with D. Kovsky (Troutman) re: Plan/Disclosure Statement (0.8); call with G. McGillivray (Bernstein Litowitz) re: Delaware claimants' Disclosure Statement objection (0.1); call with B. Silverberg (Brown Rudnick) and R. Szuba (W&C) re: Plan issues (0.2); email to F. Lawall (Troutman) and D. Kovsky (Troutman) re: Plan issues (0.1); further calls with B. Silverberg (Brown Rudnick) re: Plan issues (0.7); calls with J. Zakia (W&C) re: Plan issues (0.3); calls with D. Ninivaggi (Lordstown) re: Plan issues (1.4); further call with R. Kampfner (W&C) and J. Zakia (W&C) re: Plan issues (0.6); additional calls with R. Kampfner (W&C) re: Plan issues (0.4); email to T. Lauria (W&C) re: Plan issues (0.2); further review reply in support of Disclosure Statement (1.9); further review and comment re: Plan (1.4); further	D Turetsky	10.00	17,500.00

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	review and comment re: liquidation analysis (0.3); calls with R. Kampfner (W&C) re: Plan issues (0.2); further call with D. Ninivaggi (Lordstown) and J. Zakia (W&C) re: Plan issues (1.1).			
23 October 2023	Calls with D. Turetsky re: Plan issues (0.9); confer with client re: same (1.0); review revised Plan and Disclosure Statement (1.2).	J Zakia	3.10	5,425.00
23 October 2023	Continue work on Disclosure Statement and Plan (0.6); continue work on reply to Disclosure Statement objections (0.4); call with D. Turetsky and R. Szuba re: Plan issues (0.7); call with D. Turetsky and J. Zakia re: Plan issues (0.6); additional calls with D. Turetsky re: same (0.4); further calls with same re: same (0.2).	R Kampfner	2.90	4,611.00
23 October 2023	Confer with M. Patterson re: Plan issues.	F He	0.40	524.00
23 October 2023	Analyze draft form preliminary voting report (0.4); review and analyze revised reply in support of Disclosure Statement (0.7); analyze legal research re: same (0.3); confer with F. He re: same (0.1); analyze proposed revised solicitation timeline (0.2); correspond with L. Mezei re: same (0.1); correspond with A. Estrada of KCC re: solicitation issues (0.1); analyze further revised Plan (0.5).	D Kim	2.40	3,048.00
23 October 2023	Review correspondence from D. Turetsky re: NOL discussion in Disclosure Statement (0.1); draft Disclosure Statement provisions re: comments received (2.8); correspond with A. Kroll and Company re: same (0.2); review confirmation schedule (0.1); correspond with L. Mezei re: same (0.1); review correspondence from D. Ninivaggi re: Plan and Disclosure Statement (0.5); draft chapter 11 Plan (2.5); prepare Plan and Disclosure Statement for filing (0.6); correspond to D. Kovsky and B. Silverberg re: Plan and Disclosure Statement filing (0.7); correspond with M. Patterson and Womble team re: Plan and Disclosure Statement filing (0.3); correspond to D. Turetsky and Womble team re: agenda (0.1); correspond to D. Bender re: insurance provisions in Disclosure Statement (0.4); review liquidation analysis attached to Disclosure Statement as exhibit C and accompanying narrative (0.3); correspond to E. Hammes and Silverman team re: same (0.3); correspond to Equity Committee and Creditors' Committee re: liquidation analysis (0.3).	R Szuba	9.30	10,602.00
23 October 2023	Cite check brief (1.1); revise solicitation timeline (0.3); coordinate with D. Hirshorn re: binder (0.2).	L Mezei	1.60	1,632.00
23 October 2023	Conduct legal research re: third party release issues (0.3); review reply to Disclosure Statement objections for accuracy (0.2); correspond with L. Mezei re: Disclosure Statement reply (0.2).	P Strom	0.70	672.00
24 October 2023	Further review and comment re: Disclosure Statement reply (0.7); calls with R. Kampfner (W&C) re: Disclosure Statement issues (0.5) and Plan issues	D Turetsky	3.00	5,250.00

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	(0.2); call with M. Etkin (Lowenstein) re: Disclosure Statement issues (0.1); call with T. Manthey (Fishman Haygood) re: Disclosure Statement issues (0.1); call with D. Guyder (Allen Overy) re: Disclosure Statement issues (0.3); call with B. Silverberg (Brown Rudnick) re: Plan issues (0.5); further analysis re: Disclosure Statement issues (0.2); call with B. Hackman (US Trustee) re: Plan issues (0.2); further analysis re: Plan issues (0.2).			
24 October 2023	Calls with D. Turetsky re: Disclosure Statement issues (0.5) and Plan issues (0.2).	R Kampfner	0.70	1,113.00
24 October 2023	Further review chart of objections to Disclosure Statements and proposed responses to same (0.5); correspond with R. Szuba, F. He re: same (0.2); correspond with L. Mezei re: revisions to solicitation package materials (0.2); review and provide initial comments to preliminary voting report (0.6); correspond with A. Estrada (KCC) re: same (0.2).	D Kim	1.70	2,159.00
24 October 2023	Draft amended Plan (0.4); draft amended Disclosure Statement (0.5); confer with D. Turetsky re: amended Plan and Disclosure Statement filing (0.3); review correspondence from D. Ninivaggi and company (0.3); correspond with Creditors' Committee and Equity Committee counsel re: Plan and Disclosure Statement (0.4); correspond with Delaware counsel re: Plan and Disclosure Statement filing (0.3); compile exhibits re: same (0.4); cause Plan and Disclosure Statement to be filed (0.5); review Foxconn objection to Disclosure Statement (0.3); correspond to D. Turetsky re: same (0.2); draft reply in support of Disclosure Statement motion (0.9); review objections to Disclosure Statement (0.5).	R Szuba	5.00	5,700.00
25 October 2023	Call with R. Hamilton (Jefferies) re: Plan issues (0.3); call with B. Silverberg (Brown Rudnick) re: Plan issues (0.1); email to D. Guyder (Allen Overy) re: Foxconn Plan issues (0.1); further analysis re: Plan solicitation issues (0.2); email to M. Patterson (Womble) and D. Detweiler (Womble) re: same (0.1); call with D. Guyder (Allen Overy) re: Foxconn Plan issues (0.2); further analysis re: Plan issues (0.6); calls with D. Ninivaggi (Lordstown) re: Plan issues (0.2); call with R. Kampfner (W&C) re: Plan issues (0.2); further analysis re: Disclosure Statement issues (0.7); call with J. Barsalona (Pashman) and H. Jaffe (Pashman) re: DiamondPeak litigant Plan issues (0.4); email to H. Jaffe (Pashman) and J. Barsalona (Pashman) re: Disclosure Statement issues (0.2); email to T. Manthe (Fishman Haygood) re: Disclosure Statement issues (0.1).	D Turetsky	3.40	5,950.00
25 October 2023	Review and revise reply to Disclosure Statement objections (1.9); call with D. Turetsky re: same (0.2); call with M. Etkin re: objection of 510(b) claimants (0.5); call with Mr. Greene re: insurance provisions for Disclosure Statement (0.5); call with R. Szuba re: drafting of additional insurance provisions (0.5); review and revise email to Committees re: allowance of	R Kampfner	4.40	6,996.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	employment claims (0.4); review Foxconn issues (0.4).			
25 October 2023	Revise portions of Disclosure Statement order, including solicitation schedule (0.5); correspond with D. Turetsky, F. He and WBD team re: same (0.2); correspond with A. Estrada and KCC team re: revised solicitation schedule and related issues (0.3); review and revise reply in support of Disclosure Statement motion (0.7); review further amendments to draft Plan (0.3).	D Kim	2.00	2,540.00
25 October 2023	Draft Plan re: releases and related provisions (0.6); review materials re: same (0.5); correspond with D. Turetsky re: same (0.2); further revise Disclosure Statement (0.9); call with R. Kampfner re: insurance provisions of Disclosure Statement (0.3); correspond to D. Greene re: same (0.2); review D&O insurance documents with attention to Disclosure Statement descriptions (0.2); draft reply chart to be attached to Disclosure Statement reply (0.7).	R Szuba	3.60	4,104.00
25 October 2023	Update solicitation documents.	L Mezei	1.20	1,224.00
26 October 2023	Attention re: Plan/Disclosure Statement strategy matters.	T Lauria	0.50	1,050.00
26 October 2023	Call with Allen & Overy (C. Newcomb, D. Guyder) and R. Kampfner (W&C) re: Foxconn Disclosure Statement issues (0.4); calls with R. Kampfner (W&C) re: Plan issues (0.8); call with D. Ninivaggi (Lordstown) re: Plan issues (0.2); emails to R. Kampfner (W&C) and J. Zakia (W&C) re: Plan issues (0.1); further analysis re: Plan issues (0.3); email to H. Jaffe (Pashman) re: Disclosure Statement issues (0.3); emails to B. Hackman (US Trustee) re: Disclosure Statement issues (0.4); emails to R. Kampfner (W&C) re: Disclosure Statement issues (0.2); calls with R. Szuba (W&C) re: Disclosure Statement issues (0.1); email to D. Baddley (SEC) re: Disclosure Statement issues (0.1).	D Turetsky	2.90	5,075.00
26 October 2023	Attend call with A&O (C. Newcomb, D. Guyder) and D. Turetsky re: Disclosure Statement issues (0.4); review Disclosure Statement objection reply (1.4); review solicitation procedures (0.7).	R Kampfner	2.50	3,975.00
26 October 2023	Analyze notes to preliminary voting report (0.6); correspond with P. Strom, D. Turetsky, R. Kampfner re: same (0.2); revise proposed solicitation procedures (0.2); revise proposed solicitation schedule (0.2); correspond with A. Estrada of KCC, M. Peterson of WBD, D. Turetsky and team re: same (0.2); confer with L. Mezei re: revisions to solicitation materials (0.2).	D Kim	1.60	2,032.00
26 October 2023	Review correspondence from US Trustee re: Plan and Disclosure Statement (0.3); draft responses to same (0.3); draft reply in support of Disclosure Statement motion (3.0); correspond with R. Kampfner and D. Turetsky re: same (0.3); revise Plan and Disclosure Statement with attention to same (0.9); coordinate with	R Szuba	7.40	8,436.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	L. Mezei and D. Kim re: solicitation package (0.3); review solicitation package (0.3); correspond to L. Mezei and D. Kim re: release provisions re: solicitation package (0.2); research re: release issues (1.7); correspond with D. Turetsky re: same (0.1).			
26 October 2023	Update solicitation papers.	L Mezei	1.10	1,122.00
27 October 2023	Email to R. Szuba (W&C) re: Disclosure Statement reply (0.1); email to H. Jaffe (Pashman) and J. Barsalona (Pashman) re: Disclosure Statement matters (0.1); email to B. Hackman (US Trustee) re: Disclosure Statement matters (0.1); calls with R. Kampfner (W&C) re: Plan matters (0.4) and Disclosure Statement issues (0.3); further review and comment re: reply in support of Disclosure Statement (1.7); call with T. Manthey (Fishman Haygood) re: Disclosure Statement issues (0.1); call with R. Szuba (W&C) re: Disclosure Statement issues (0.1); call with D. Detweiler (Womble) re: Plan/Disclosure Statement issues (0.1); call with D. Ninivaggi (Lordstown) re: Plan/Disclosure Statement issues (0.2); email to R. Kampfner (W&C) and J. Zakia (W&C) re: Plan/Disclosure Statement issues (0.1); call with B. Silverberg (Brown Rudnick) re: Plan/Disclosure Statement issues (0.2); emails to D. Kim (W&C) re: solicitation issues (0.1); call with D. Baddley (SEC) re: Disclosure Statement issues (0.3); call with B. Hackman (US Trustee) re: Disclosure Statement issues (0.1).	D Turetsky	4.00	7,000.00
27 October 2023	Review and revise Plan (2.1); emails with 510(b) claimants (0.9); attend various calls with D. Turetsky and J. Zakia re: third party releases (0.5); attend internal call re: solicitation procedures (0.7).	R Kampfner	4.20	6,678.00
27 October 2023	Confer with R. Szuba re: Plan issues.	F He	0.40	524.00
27 October 2023	Analyze revise proposed voting report (0.4); prepare analysis and share with D. Turetsky, R. Kampfner, F. He, R. Szuba (0.1).	D Kim	0.50	635.00
27 October 2023	Draft Plan (0.5); draft Disclosure Statement (0.3); draft reply (0.5); research re: same (0.3); confer with D. Turetsky re: same (0.2); draft email to company re: Plan and Disclosure Statement (0.2); draft email to Equity Committee and Creditors' Committee re: same (0.2); correspond with D. Greene re: insurance insert for Disclosure Statement (0.1); review ballots (0.3); correspond with L Mezei and D. Kim re: same (0.1).	R Szuba	2.70	3,078.00
27 October 2023	Continue update solicitation papers (3.2); draft disclosure statement hearing outline (2.7).	L Mezei	5.90	6,018.00
28 October 2023	Email to D. Ninivaggi (Lordstown) re: Plan inquiry (0.2); further review and comment re: Disclosure Statement (0.9); emails to R. Szuba (W&C) and R. Kampfner (W&C) re: Plan/disclosure issues (0.3); calls with R. Szuba (W&C) re: Disclosure Statement issues (0.3); calls with D. Ninivaggi (Lordstown) re: Plan	D Turetsky	2.80	4,900.00



LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	issues (0.4); calls with R. Kampfner (W&C) re: Plan issues (0.3); further analysis re: Disclosure Statement issues (0.4).			
28 October 2023	Attention to Plan negotiations.	R Kampfner	0.80	1,272.00
28 October 2023	Call with R. Szuba and D. Kim re: various issues and work streams for Disclosure Statement reply and hearing (0.7); review and revise Disclosure Statement response chart for reply brief (2.3).	F He	3.00	3,930.00
28 October 2023	Further revise proposed solicitation order based on revisions to plan/disclosure statement (0.5); further review solicitation procedures and other solicitation materials based on Plan revisions (2.5); calls with L. Mezei re: same (0.4); call with F. He, R. Szuba re: open issues and tasks (0.4).	D Kim	3.80	4,826.00
28 October 2023	Further research re: 510(b) treatment issues (1.5); research re: treatment and classification at Disclosure Statement phase (1.3); correspond to objectors re: Plan and Disclosure Statement (0.9); draft Disclosure Statement (1.1); draft Plan (0.4).	R Szuba	5.20	5,928.00
29 October 2023	Emails to F. He (W&C), D. Kim (W&C) and R. Szuba (W&C) re: Disclosure Statement/solicitation issues (0.1); further review and comment re: Disclosure Statement reply (2.3); calls with R. Szuba (W&C) re: Disclosure Statement issues (0.2); call with D. Kovsky (Troutman) re: Plan issues (0.1); calls with R. Kampfner (W&C) re: Disclosure Statement issues (0.1), solicitation issues (0.3); review and comment re: Disclosure Statement reply exhibit (1.1); review and comment re: solicitation procedures order (0.8); call with D. Kovsky (Troutman), F. Lawall (Troutman), R. Kampfner (W&C) and R. Szuba (W&C) re: Plan issues (0.3); further call with R. Kampfner (W&C) and R. Szuba (W&C) re: Plan issues (0.3); review ballots (1.3); call with B. Silverberg (Brown Rudnick) re: Plan issues (0.1); further review and comment re: Plan (0.3); further review and comment re: Disclosure Statement (0.2); emails to C. Newcomb (Allen Overy) and D. Guyder (Allen Overy) re: Foxconn Plan issues (0.2).	D Turetsky	7.70	13,475.00
29 October 2023	Continue to review and revise Plan/Disclosure Statement (1.3); review and revise reply (1.1); review and revise solicitation order (1.3); call with D. Turetsky re: Plan issues (0.1) and solicitation issues (0.3); call with D. Kovsky, F. Lawall, D. Turetsky and R. Szuba re: Plan issues (0.3); additional call with D. Turetsky and R. Szuba re: Plan issues (0.3).	R Kampfner	4.70	7,473.00
29 October 2023	Confer with R. Szuba re: Plan issues (0.4); revise response chart to reply (0.9); review notices for filing Disclosure Statement material (0.5); revise reply brief for Disclosure Statement hearing (0.7).	F He	2.50	3,275.00
29 October 2023	Further revise Disclosure Statement order based on comments received/changes to solicitation procedures	D Kim	4.10	5,207.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(1.0); circulate revised solicitation order and exhibits to Debtors and Committees (0.2); further revise solicitation procedures (0.5); review and finalize ballots/solicitation materials to comport with modified Plan and Disclosure Statement (1.5); correspond with L. Mezei re: same (0.4); calls with D. Turetsky re: solicitation material comments (0.2); coordinate with M. Patterson (WBD) re: filing of all documents (0.3).			
29 October 2023	Further draft Disclosure Statement reply (1.9); research re: same (0.9); draft Plan (1.3); revise Disclosure Statement (1.7); draft objection chart to be attached as Ex. A to reply in support of Disclosure Statement motion (1.2); call with D. Kovsky (Creditors' Committee), D. Turetsky, and R. Kampfner (0.3); correspond to counsel to Foxconn re: Plan and Disclosure Statement (0.1); review correspondence from Foxconn re: same (0.1); correspond with M. Patterson and Womble team re: filing Plan and Disclosure Statement (0.3); review notice of filing of Plan and Disclosure Statement and redlines (0.2); further call with R. Kampfner and D. Turetsky re: Plan issues (0.3).	R Szuba	8.30	9,462.00
29 October 2023	Revise solicitation paper.	L Mezei	1.80	1,836.00
29 October 2023	Review and comment on Disclosure Statement objection reply re: accuracy and completeness.	P Strom	1.70	1,632.00
30 October 2023	Attention re: Plan/Disclosure Statement matters.	T Lauria	0.40	840.00
30 October 2023	Call with Fishman Haygood (T. Manthey, T. Elrod and others), R. Szuba (W&C), and R. Kampfner (W&C) re: RIDE Disclosure Statement issues (0.3); calls with B. Silverberg (Brown Rudnick) re: Disclosure Statement issues (0.8); call with D. Baddley (SEC) re: solicitation issues (0.1); emails to H. Jaffe (Pashman) re: Delaware claimants' disclosure objection (0.1); emails to B. Silverberg (Brown Rudnick), D. Kovsky (Troutman) and others re: Disclosure Statement objections (0.4); email to D. Ninivaggi (Lordstown) re: Ohio class Disclosure Statement issues (0.1); emails to D. Baddley (SEC) re: SEC Disclosure Statement issues (0.1); calls with D. Baddley (SEC) re: SEC Disclosure Statement issues (0.1); call with Lowenstein (A. Behlmann, C. Restel, and S. Cargill), R. Kampfner (W&C), and R. Szuba (W&C) re: Ohio class Disclosure Statement issues (0.6); call with R. Kampfner (W&C) and R. Szuba (W&C) re: Ohio class Disclosure Statement issues (0.2); call with D. Ninivaggi (Lordstown) and J. Zakia (W&C) re: Ohio Lead Plaintiff Disclosure Statement issues (0.2); review and analysis RIDE investor group supplement Disclosure Statement objection (0.3); email to C. Newcomb (Allen & Overy) and D. Guyder (Allen & Overy) re: Foxconn voting issues (0.1); further analysis re: Foxconn voting issues (0.2); further review and comment re: Disclosure Statement (0.7); further review and comment re: Plan (0.3); further call with D. Kovsky (Troutman) re: committee support letter (0.1).	D Turetsky	4.70	8,225.00



**WHITE & CASE**

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
30 October 2023	Review and comment re: revised Disclosure Statement.	J Zakia	1.10	1,925.00
30 October 2023	Attend call with RIDE claimants (0.5); attend call with Ohio Securities Law claimants (0.5); draft Disclosure Statement language re: section 510(b) treatment (0.9); review language provided by section 510(b) claimants (0.5); attention to solicitation order and exhibits (1.3).	R Kampfner	3.70	5,883.00
30 October 2023	Analyze and review potential solicitation voting report issues (1.0); correspond with A. Estrada of KCC re: same (0.1); review and revise ballots (0.8); correspond with L. Mezei re: same (0.3); review and provide comments to notices for further modified Plan and Disclosure Statement materials (0.3); correspond with M. Patterson (WBD) re: same (0.1); review further modified Plan (0.4); analyze further modifications to Disclosure Statement (0.4).	D Kim	3.40	4,318.00
30 October 2023	Call with D. Turetsky, R. Kampfner, and counsel to RIDE Investor Group plaintiffs re: releases (0.4); call with D. Turetsky, R. Kampfner, and counsel to Ohio Lead plaintiff re: Disclosure Statement objections (0.5); draft emails to counsel to Ohio Lead plaintiff (0.4); draft emails to company re: Plan and Disclosure Statement (0.5); draft emails to Equity Committee and Creditors' Committee re: Plan and Disclosure Statement (0.6); review emails from Creditors' Committee and Equity Committee re: Plan and Disclosure Statement (0.4); draft Disclosure Statement (2.2); call with R. Kampfner re: same (0.4); draft Plan (0.7); research re: supplemental RIDE Group objection same (0.5); correspond to D. Turetsky re: RIDE Group objection and supplemental objection (0.2).	R Szuba	6.80	7,752.00
30 October 2023	Update ballots.	L Mezei	1.90	1,938.00
31 October 2023	Review Ohio Lead Plaintiff supplemental objection to DS (0.2); call with M. Etkin (Lowenstein) re: Ohio lead plaintiff objection to DS (0.1); emails to T. Manthey (Fishman Haygood) re: RIDE Disclosure Statement objection (0.1); review proposals in connection with RIDE Disclosure Statement objection (0.2); calls with R. Kampfner (W&C) re: Plan confirmation issues (0.3); call with B. Silverberg (Brown Rudnick) and M. Patterson (Womble) re: equity committee support letter issues (0.1); email to F. Lawall (Troutman) and D. Kovsky (Troutman) re: Creditors' Committee support letter (0.1); review Creditors' Committee letter in support of Plan (0.1); review equity committee Plan support letter (0.1); further call with B. Silverberg (Brown Rudnick) re: equity committee letter (0.1); email to T. Manthey (Fishman Haygood), H. Jaffe (Pashman), M. Etkin (Lowenstein) and others re: equity committee support letter (0.2); call with R. Szuba (W&C) re: solicitation order issues (0.1); additional calls with B. Silverberg (Brown Rudnick) and R. Kampfner (W&C) re: equity committee support letter issues (0.3); calls with M. Patterson (Womble) re: solicitation issues (0.1).	D Turetsky	2.10	3,675.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
31 October 2023	Finalize solicitation procedures (0.6); review Equity Committee letter (0.5); review Creditors' Committee Plan letter (0.5).	R Kampfner	1.60	2,544.00
31 October 2023	Confer with D. Kim re: solicitation issues (0.4); confer with M. Patterson (Womble) re: Disclosure Statement order issues (0.3).	F He	0.70	917.00
31 October 2023	Revise Disclosure Statement order (0.2); correspond with D. Turetsky, R. Szuba re: same (0.1); analyze revised voting report (0.6); confer with R. Kampfner, F. He and team re: proposed responses to same (0.4); correspond with A. Estrada (KCC) re: same (0.3); review and analyze draft support letter of Equity Committee (0.3); analyze correspondence from class action plaintiffs re: same (0.1); review and analyze draft support letter from Creditors' Committee (0.2).	D Kim	2.20	2,794.00
31 October 2023	Review Creditors' Committee support letter (0.2); confer with R. Kampfner re: same (0.2); review Equity Committee support letter (0.2); prepare solicitation version of Plan for filing (0.3); prepare solicitation version of Disclosure statement for filing (0.2); correspond with P. Patterson re: solicitation (0.2); draft emails to KCC team re: solicitation Plan (0.4); confer with F. He and D. Kim re: same (0.3).	R Szuba	2.00	2,280.00
<b>SUBTOTAL: Exclusivity, Plan &amp; Disclosure Statement</b>			<b>514.40</b>	<b>723,119.00</b>

### Executory Contracts & Unexpired Leases

2 October 2023	Review contract cure issues.	R Kampfner	0.50	795.00
2 October 2023	Confer with M. Leonard, A. Kroll and M. Port (Company) re: vendor contract issues (0.3); confer with J. Zakia re: executory contract rejection issues (0.2); confer with A. Steel (RLF) re: contract rejection issues (0.3); confer with R. Szuba re: assumption of contract issues (0.5); draft email memo to company re: same (0.7); follow-up questions to Silverman re: executory contract rejection issues (0.3); confer with C. Tsitsis (Silverman) re: cure issues (0.3); confer with P. Strom re: cure objection issues (0.3).	F He	2.90	3,799.00
2 October 2023	Review and analyze revised cure objection tracker.	D Kim	0.10	127.00
3 October 2023	Analyze revised cure objection tracker (0.2); correspond with P. Strom re: same (0.1).	D Kim	0.30	381.00
3 October 2023	Call with F. He re: intellectual property contract issue (0.2); draft email to D. Turetsky, R. Kampfner, and F. He re: intellectual property contract issue (0.1); review emails from Company re: same (0.1).	R Szuba	0.40	456.00
4 October 2023	Analyze correspondence re: revised cure amounts and potential assumed contracts.	D Kim	0.20	254.00
4 October 2023	Draft emails to D. Bell and Company re: intellectual	R Szuba	1.20	1,368.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	property licenses in connection with sale (0.3); call with F. He re: intellectual property contracts and contract issues (0.5); review correspondence from D. Bell and company re: contract issues (0.2); review contracts in connection with buyer inquiries (0.2).			
5 October 2023	Analyze revised cure issues re: Cigna (0.1); analyze proposed cure objection response to objecting party (0.1).	D Kim	0.20	254.00
5 October 2023	Correspond to M. Leonard and D. Bell re: contract issues (0.4); review documents re: same (0.3); correspond to counsel to LAS Capital re: same (0.1); review cure objection of Nexteer to potential assumption and assignment (0.2).	R Szuba	1.00	1,140.00
6 October 2023	Call with counsel to LAS Capital re: contracts (0.2); correspond with M. Leonard, D. Bell and company re: intellectual property agreements in connection with sale (0.3); review correspondence with LAS Capital re: contracts (0.2).	R Szuba	0.70	798.00
7 October 2023	Draft correspondence to counsel to D. Almogue (counsel to LAS Capital) re: contract diligence (0.2); review correspondence from C. Tsitsis and Silverman team re: same (0.1).	R Szuba	0.30	342.00
9 October 2023	Correspond to M. Leonard and company re: potential assumptions (0.2); review contracts in connection with potential assumptions (0.3); correspond to counsel to LAS Capital re: executory contracts in connection with sale (0.4).	R Szuba	0.90	1,026.00
10 October 2023	Confer with C. Tsitsis (Silverman) re: cure objection.	F He	0.30	393.00
10 October 2023	Correspond with D. Almogue and others from Skadden re: IP and contracts relating to sale (0.5); correspond to company re: same (0.3); review documents re: same (0.1).	R Szuba	0.90	1,026.00
11 October 2023	Review proposed resolution of certain cure objections.	D Kim	0.20	254.00
12 October 2023	Analyze draft notice of assignment of asset purchase agreement (0.1); correspond with F. He re: same (0.1); correspond with A. Estrada (KCC) re: service of notice of same on affected claimants (0.1).	D Kim	0.30	381.00
12 October 2023	Confer with F. He and D. Turetsky re: Elaphe license (0.1); draft analysis re: same (0.1).	R Szuba	0.20	228.00
15 October 2023	Email to S. Grow (Warner Norcross) re: Elaphe cure objection (0.1); emails to E. Hightower (Lordstown), A. Kroll (Lordstown), M. Leonard (Lordstown) and D. Tsitsis (Silverman) re: Elaphe cure issues (0.1); call with S. Grow (Warner Norcross) re: Elaphe issues (0.2).	D Turetsky	0.40	700.00
15 October 2023	Confer with F. He re: sale order language on cures	R Szuba	0.30	342.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	(0.1); research re: cure issues (0.2).			
16 October 2023	Email to S. Grow (Warner Norcross) re: Elaphe issues (0.1); emails to F. He (W&C) re: Elaphe issues (0.1); email to E. Hightower (Lordstown) re: Elaphe issues (0.1).	D Turetsky	0.30	525.00
16 October 2023	Calls and correspondence with F. He re: ongoing negotiations re: cure objections.	D Kim	0.50	635.00
16 October 2023	Review correspondence with J. Madden (LAS Capital counsel) re: contract inquiries in connection with sale (0.3); review documents re: same (0.2); draft response re: same (0.3); correspond to M. Leonard and D. Bell re: same (0.2).	R Szuba	1.00	1,140.00
17 October 2023	Draft contract/lease rejection motion.	L Mezei	2.30	2,346.00
18 October 2023	Review correspondence from J. Madden (LAS Counsel) re: contract issues concerning sale (0.2); correspond with M. Leonard and D. Bell re: same (0.2); review correspondence from C. Stringer (company) re: same (0.1); review documents re: same (0.5); correspond to LAS Capital counsel re: same (0.3).	R Szuba	1.30	1,482.00
19 October 2023	Review correspondence from D. Almogue (LAS Counsel) re: certain contracts for potential assumption re: sale (0.1); correspond to A. Kroll and company re: same (0.3); correspond to LAS Capital counsel re: same (0.2).	R Szuba	0.60	684.00
23 October 2023	Confer with F. He re: issues re: rejection motion.	R Szuba	0.20	228.00
24 October 2023	Further confer with M. Mollerus (Silverman) re: contract assumption issues (0.6); confer with Buyer counsel re: assumption list notice (0.3).	F He	0.90	1,179.00
25 October 2023	Calls and emails with M. Leonard re: assumption of contracts issues re: closing (0.7); review material re: same (0.6); confer with D. Turetsky re: same (0.4); confer with M. Leonard re: same (0.2); review and revise assumption list re: sale (0.3); confer with M. Patterson re: same (0.2); confer with Creditors' Committee re: same (0.2); confer with Equity Committee re: same (0.1); review and revise motion to extend deadline to assume/reject leases (0.8); confer with Creditors' Committee re: same (0.1); confer with Equity Committee re: same (0.1); confer with M. Patterson re: same (0.3).	F He	4.00	5,240.00
25 October 2023	Review draft motion to extend time to assume/reject contracts (0.3); confer with F. He re: same (0.1).	D Kim	0.40	508.00
25 October 2023	Revise omnibus motion to reject certain executory contracts.	P Strom	0.90	864.00
26 October 2023	Review and revise motion to reject (0.5); confer with M. Mollerus re: same (0.2).	F He	0.70	917.00

**WHITE & CASE**

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
27 October 2023	Call with D. Guyder (Allen Overy) re: Foxconn manufacturing agreement issues.	D Turetsky	0.20	350.00
27 October 2023	Review and revise motion to reject (0.5); confer with M. Mollerus re: same (0.5); confer with A. Kroll (Company) re: same (0.3); review schedule to motion to reject and provide comments (0.3); research and confer with J. Zakia re: contract issues (0.3).	F He	1.90	2,489.00
28 October 2023	Review and revise motion to reject.	F He	0.50	655.00
30 October 2023	Call and emails with S. Kohler (Silverman) re: contracts to reject (0.6); confer with A. Kroll and M. Leonard (Company) re: same (0.7).	F He	1.30	1,703.00
31 October 2023	Review and comment re: contract rejection motion (0.2); call with F. He (W&C) re: contract rejection motion (0.1).	D Turetsky	0.30	525.00
31 October 2023	Review motion to reject executory contracts.	R Kampfner	0.70	1,113.00
31 October 2023	Review and revise schedule/list contracts to reject (0.6); confer with S. Kohler re: same (0.3); confer with A. Kroll and M. Leonard (Company) re: same (0.5).	F He	1.40	1,834.00
31 October 2023	Draft rejection motion (0.5); research re: same (0.2); review schedule re: same (0.2).	R Szuba	0.90	1,026.00
<b>SUBTOTAL: Executory Contracts &amp; Unexpired Leases</b>			<b>31.60</b>	<b>39,507.00</b>

**Hearings & Court Matters**

2 October 2023	Review and analyze draft Oct. 5 hearing agenda (0.1); correspond with J. Madron (RLF) re: same (0.1).	D Kim	0.20	254.00
2 October 2023	Prepare script with status update for upcoming omnibus hearing (1.4); correspond with D. Turetsky re: same (0.2).	R Szuba	1.60	1,824.00
4 October 2023	Revise script for case update at hearing.	D Turetsky	0.40	700.00
5 October 2023	Provide case update to Court on behalf of Debtors at hearing.	D Turetsky	0.20	350.00
10 October 2023	Email to D. Detweiler (WBD) and M. Patterson (WBD) re: Disclosure Statement hearing issues (0.1); email to R. Stark (Brown Rudnick), B. Silverberg (Brown Rudnick), F. Lawall (Troutman) and D. Kovsky (Troutman) re: Disclosure Statement hearing issues (0.1); call with M. Patterson (WBD) re: Disclosure Statement hearing issues (0.1).	D Turetsky	0.30	525.00
10 October 2023	Review draft notice of rescheduled Disclosure Statement hearing (0.1); correspond with M. Patterson, proposed local counsel, D. Turetsky, F. He, R. Szuba re: same (0.1).	D Kim	0.20	254.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
11 October 2023	Review further revised hearing notice for Disclosure Statement (0.1); correspond with D. Detweiler re: same (0.1).	D Kim	0.20	254.00
14 October 2023	Review and revise draft Oct. 18 hearing agenda (0.2); correspond with M. Patterson (WBD) re: same (0.1); confer with F. He re: related administrative matters for Oct. 18 hearing (0.1).	D Kim	0.40	508.00
15 October 2023	Further analysis re: sale hearing issues.	D Turetsky	0.50	875.00
15 October 2023	Review revised draft of Oct. 18 hearing agenda (0.2); correspond with F. He re: matters going forward (0.1).	D Kim	0.30	381.00
16 October 2023	Review amended October 18 hearing agenda based on filing of sale documents (0.1); correspond with L. Mezei re: same (0.2); confer with F. He re: revised portions of same (0.2); review and provide comments to draft hearing agendas for Oct. 18 hearing (0.3).	D Kim	0.80	1,016.00
16 October 2023	Draft hearing outline.	L Mezei	2.10	2,142.00
16 October 2023	Prepare hearing binder for D. Turetsky and L. Mezei.	D Hirshorn	2.00	760.00
17 October 2023	Call with M. Patterson (Womble) and D. Detweiler (Womble) re: sale hearing issues (0.2); email to D. Ninivaggi (Lordstown) re: October 18 hearing issues (0.1); call with D. Ninivaggi (Lordstown) re: hearing issues (0.1); call with J. Zakia (W&C) re: hearing preparation issues (0.1); call with R. Hamilton (Jefferies) and J. Zakia (W&C) re: hearing preparation (0.2); draft script for sale hearing (0.8); further prepare for sale hearing (0.4).	D Turetsky	1.90	3,325.00
17 October 2023	Prepare for sale hearing.	J Zakia	0.50	875.00
17 October 2023	Call with M. Patterson re: various sale hearing issues (0.5); prepare material for sale hearing (2.8).	F He	3.30	4,323.00
17 October 2023	Conduct research (1.9) and prepare materials (0.9) in preparation for sale hearing; numerous calls and correspondence with D. Turetsky, F. He re: same (0.6); analyze final sale order and documents for hearing (0.7).	D Kim	4.10	5,207.00
18 October 2023	Further draft script for sale hearing (0.4); call with J. Zakia (W&C) re: sale hearing issues (0.1); calls with J. Madden (Skadden) re: sale hearing issues (0.2); call with R. Meisler (Skadden) re: sale hearing/post-hearing issues (0.4); call with F. He (W&C) re: sale hearing issues (0.1); call with D. Kovsky (Troutman) re: sale hearing issues (0.1); calls with B. Silverberg (Brown Rudnick) re: sale hearing issues (0.1); further prepare for sale hearing (0.9); represent Debtors at sale hearing (0.4).	D Turetsky	2.70	4,725.00
18 October 2023	Prepare for sale hearing (0.3); attend sale hearing (0.4); calls with D. Turetsky re: same (0.2).	J Zakia	0.90	1,575.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
18 October 2023	Attend sale hearing via zoom.	R Kampfner	0.40	636.00
18 October 2023	Attend sale hearing in event of court inquiries concerning asset purchase agreement.	A Cieply	0.40	584.00
18 October 2023	Confer with D. Turetsky in preparation of sale hearing and research re: same.	F He	0.60	786.00
18 October 2023	Attend virtual sale hearing (0.4); correspond with M. Patterson re: form of sale order (0.1); confer with C. Giobbe re: service of entered sale order (0.1); confer with F. He re: omnibus hearing dates and related case administration matters (0.1).	D Kim	0.70	889.00
18 October 2023	Confer with L. Mezei re: sale hearing issues (0.2); locate and call/email Chambers re: sale hearing issues (0.2).	D Hirshorn	0.40	152.00
23 October 2023	Call with D. Detweiler (Womble) re: Disclosure Statement hearing issues (0.1); call with D. Guyder (Allen Overy) re: Disclosure Statement hearing issues (0.1); call with G. McDaniel (Hogan McDaniel) re: Disclosure Statement hearing issues (0.1); call with T. Manthey re: Disclosure Statement hearing issues (0.1).	D Turetsky	0.40	700.00
23 October 2023	Review draft Oct. 25 hearing agenda (0.1); correspondence with D. Detweiler and M. Patterson re: status conference (0.1).	D Kim	0.20	254.00
24 October 2023	Draft script for Disclosure Statement hearing.	D Turetsky	0.70	1,225.00
24 October 2023	Call with D. Turetsky, F. He, R. Szuba and team re: Disclosure Statement issues and preparation for October 25 status conference.	D Kim	0.40	508.00
24 October 2023	Diligence in connection with hearing issues (0.3) and coordinate with K. Wick re: same (0.1).	L Mezei	0.40	408.00
25 October 2023	Call with M. Patterson (Womble) re: hearing issues (0.1); email to D. Detweiler (Womble) and M. Patterson (Womble) re: hearing issues (0.1); prepare for hearing (0.3); represent Debtors at hearing (0.4); call with J. Zakia (W&C) re: hearing issues (0.1); further call with Womble (D. Detweiler and M. Patterson) and R. Kampfner (W&C) re: Disclosure Statement hearing issues (0.2).	D Turetsky	1.20	2,100.00
25 October 2023	Confer with D. Turetsky re: hearing strategy issues.	J Zakia	0.10	175.00
25 October 2023	Attend hearing on Disclosure Statement.	R Kampfner	0.40	636.00
25 October 2023	Attend virtual status conference with court (0.4); manage preparations for same (0.1).	D Kim	0.50	635.00
25 October 2023	Prepare for (0.2) and attend hearing re: Disclosure Statement and Plan update (0.4).	R Szuba	0.60	684.00



**WHITE & CASE**

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
26 October 2023	Correspond with L. Mezei re: hearing transcript.	R Szuba	0.20	228.00
27 October 2023	Confer with D. Turetsky and R. Kampfner re: disclosure statement hearing strategy issues.	J Zakia	0.40	700.00
29 October 2023	Confer with D. Kim re: disclosure statement hearing preparation issues.	F He	0.30	393.00
29 October 2023	Review and prepare portions of outline for Disclosure Statement hearing.	D Kim	0.20	254.00
29 October 2023	Review hearing agenda for Disclosure Statement hearing.	R Szuba	0.10	114.00
30 October 2023	Calls with R. Kampfner (W&C) re: Disclosure Statement hearing issues (0.6); draft script for Disclosure Statement hearing (2.1); further research/prepare for Disclosure Statement hearing (2.4).	D Turetsky	5.10	8,925.00
30 October 2023	Prepare for disclosure statement hearing (1.1); calls with D. Turetsky re: disclosure statement hearing issues (0.6).	R Kampfner	1.70	2,703.00
30 October 2023	Draft and prepare outline for Disclosure Statement hearing (2.3); review and provide comments to draft hearing agenda (0.2); correspond with M. Patterson and C. Giobbe (WBD) re: same (0.1).	D Kim	2.60	3,302.00
30 October 2023	Diligence in connection with disclosure statement hearing issues (0.4); confer with D. Hirschorn re: same (0.3).	L Mezei	0.70	714.00
30 October 2023	Prepare hearing binder (1.0) and case law binder in preparation for hearing (1.0).	D Hirshorn	2.00	760.00
31 October 2023	Further prepare for Disclosure Statement hearing (0.9); calls with D. Ninivaggi (Lordstown) re: Disclosure Statement hearing issues (0.1); calls with R. Kampfner (W&C) re: Disclosure Statement hearing issues (0.2); represent Debtors at Disclosure Statement hearing (0.6).	D Turetsky	1.80	3,150.00
31 October 2023	Prepare for (1.3); and attend hearing on Disclosure Statement (0.6); calls with D. Turetsky re: disclosure statement hearing issues (0.2).	R Kampfner	2.10	3,339.00
31 October 2023	Attend Disclosure Statement hearing.	F He	0.60	786.00
31 October 2023	Attend virtual Disclosure Statement hearing.	D Kim	0.60	762.00
31 October 2023	Prepare for (0.4) and attend hearing re: Disclosure Statement motion (0.6).	R Szuba	1.00	1,140.00
<b>SUBTOTAL: Hearings &amp; Court Matters</b>			<b>49.40</b>	<b>67,515.00</b>



LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
<b>Insurance Issues</b>				
5 October 2023	Email to D. Kim (W&C) re: product liability insurance issues.	D Turetsky	0.10	175.00
5 October 2023	Analyze correspondence from company re: product liability insurance (0.1); research Debtors obligations re: Safety Act obligations (0.2); correspond and confer with D. Turetsky, F. He re: same (0.1).	D Kim	0.40	508.00
5 October 2023	Locate and email product liability insurance policies to F. He and P. Strom.	D Hirshorn	0.20	76.00
6 October 2023	Research re: insurance issues and confer with D. Turetsky.	F He	1.80	2,358.00
10 October 2023	Research re: warranty and insurance issues.	L Mezei	1.10	1,122.00
10 October 2023	Conduct legal research re: D&O liability re: insurance issues.	P Strom	1.80	1,728.00
18 October 2023	Review insurance policies (0.3); confer with client re: same (0.2).	J Zakia	0.50	875.00
25 October 2023	Emails to F. He (W&C) re: D&O insurance issues.	D Turetsky	0.10	175.00
<b>SUBTOTAL: Insurance Issues</b>			<b>6.00</b>	<b>7,017.00</b>

**Litigation**

1 October 2023	Review and analysis of Foxconn motion to dismiss.	J Green	1.20	1,572.00
2 October 2023	Call with B. Silverberg (W&C) re: Foxconn issues (0.4); call with R. Kampfner (W&C) and J. Zakia (W&C) re: securities/SEC litigation issues (0.2); call with D. Ninivaggi (Lordstown) re: SEC/securities litigation issues (0.1); calls with B. Silverberg (Brown Rudnick), M. Winograd (Brown Rudnick), and J. Zakia (W&C) re: litigation issues (0.5).	D Turetsky	1.20	2,100.00
2 October 2023	Review legal research re: motion to dismiss (1.1); confer with Equity Committee and D. Turetsky counsel re: litigation issues (0.5); call with D. Turetsky and R. Kampfner re: securities litigation issues (0.2).	J Zakia	1.80	3,150.00
2 October 2023	Attend call with J. Zakia and D. Turetsky re: issues with securities claimants.	R Kampfner	0.20	318.00
2 October 2023	Review and analysis of motion to dismiss (0.8); outline response (1.4).	J Green	2.20	2,882.00
3 October 2023	Call with Brown Rudnick (R. Stark (partial), B. Silverberg (partial), and M. Winograd) re: securities litigation issues (0.5); calls with J. Zakia (W&C) re: securities litigation issues (0.2).	D Turetsky	0.70	1,225.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
3 October 2023	Confer with opposing counsel re: potential settlement issues (0.3); confer with client re: litigation strategy (0.4).	J Zakia	0.70	1,225.00
3 October 2023	Review and analysis of motion to dismiss (1.7); outline response (1.2).	J Green	2.90	3,799.00
4 October 2023	Call with J. Zakia (W&C) and R. Kampfner (W&C) re: Foxconn issues (0.2) and securities litigation issues (0.3).	D Turetsky	0.50	875.00
4 October 2023	Prepare for Ohio litigation mediation (0.4); review mediation submission (0.3); confer with client and Equity Committee counsel re: same (0.1); update client re: same (0.2).	J Zakia	1.00	1,750.00
4 October 2023	Call with J. Zakia and D. Turetsky re: Foxconn issues (0.2) and securities litigation issues (0.3).	R Kampfner	0.50	795.00
4 October 2023	Review and analysis of motion to dismiss (0.8); outline response (1.3).	J Green	2.10	2,751.00
5 October 2023	Calls with J. Zakia (W&C) re: securities litigation issues (1.2); call with D. Ninivaggi (Lordstown) re: securities litigation issues (0.5); further call with J. Zakia (W&C) and R. Kampfner (W&C) re: securities litigation issues (0.2); call with R. Stark (Brown Rudnick) re: securities litigation issues (0.2).	D Turetsky	2.10	3,675.00
5 October 2023	Calls with D. Turetsky re: securities litigation issues (1.2); further call with D. Turetsky and R. Kampfner re: same (0.2); participate in mediation (2.0); confer with client re: same (0.5); review legal research re: Foxconn motion to dismiss (1.4).	J Zakia	5.30	9,275.00
5 October 2023	Review potential settlement with class action claimants (0.2); call with J. Zakia and D. Turetsky re: securities litigation issues (0.2).	R Kampfner	0.40	636.00
5 October 2023	Review and analysis of motion to dismiss (1.3); outline response (0.9).	J Green	2.20	2,882.00
6 October 2023	Call with B. Silverberg (Brown Rudnick) re: Delaware action issues (0.1); further call with Brown Rudnick (R. Stark, B. Silverberg) and J. Zakia (W&C) re: securities litigation issues (0.4).	D Turetsky	0.50	875.00
6 October 2023	Confer with client re: securities settlement (0.5); confer with Sullivan & Cromwell and client re: SEC (0.4); confer with Equity Committee counsel re: litigation issues (0.5); confer with Foxconn's counsel re: motion to dismiss (0.2); confer with securities plaintiffs' counsel re: mediation (0.3); confer with directors' counsel re: DiamondPeak matter (0.4); confer with client re: same (0.1); for motion to dismiss response (0.5); confer with J. Green re: same (0.2); confer with D. Turetsky re: Labaton/securities litigation (0.2) and Foxconn strategy (0.2).	J Zakia	3.50	6,125.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
6 October 2023	Review and analysis of motion to dismiss (1.0); outline response (1.6).	J Green	2.60	3,406.00
6 October 2023	Email with J. Green re: Foxconn motion to dismiss (0.3); review case law and authorities re: motions to compel arbitration (1.2); prepare memorandum analyzing same (0.9).	S Kaul	2.40	2,544.00
7 October 2023	Review and analysis of motion to dismiss (0.7); outline response (0.9).	J Green	1.60	2,096.00
7 October 2023	Research re: arbitration of equitable subordination claim (0.8), bankruptcy court discretion to enforce arbitration clause (0.9), and standard applicable to core matters (0.7); review Third Circuit precedent re: same (1.0); further prepare memorandum addressing same (1.4).	S Kaul	4.80	5,088.00
8 October 2023	Call with J. Zakia (W&C) re: Foxconn issues (0.1) and securities litigation issues (0.1).	D Turetsky	0.20	350.00
8 October 2023	Review and analysis of motion to dismiss (0.9); outline response (0.5).	J Green	1.40	1,834.00
8 October 2023	Research re: bifurcation of issues for arbitration (0.6); analyze argument re: arbitration of core matters (0.8); further memorandum re: bankruptcy court discretion and analysis on motions to compel arbitration (1.6); email A. Padmanabhan re: same (0.1).	S Kaul	3.10	3,286.00
9 October 2023	Call with R. Kampfner (W&C) and J. Zakia (W&C) re: securities litigation issues (0.5); further calls with J. Zakia (W&C) re: securities settlement issues (0.1).	D Turetsky	0.60	1,050.00
9 October 2023	Confer with directors' counsel re: potential settlement (0.4); confer with Equity Committee counsel re: DiamondPeak settlement (0.2); confer with Creditor's Committee's counsel re: DiamondPeak settlement (0.2); confer with client re: case status (0.6).	J Zakia	1.40	2,450.00
9 October 2023	Call with D. Turetsky and J. Zakia re: securities litigation issues.	R Kampfner	0.50	795.00
9 October 2023	Review and analysis of motion to dismiss (1.3); outline response (1.1).	J Green	2.40	3,144.00
9 October 2023	Research bankruptcy court authority to stay adversary proceeding in connection with Foxconn motion to dismiss (0.7) and review case law re: same (0.6); analysis re: authority to stay balance of claims for arbitration (1.4); draft email to A. Padmanabhan re: same (0.4); further draft arbitration memo (1.6); call with A. Padmanabhan re: same (0.4); revise draft arbitration memo per same (0.6).	S Kaul	5.70	6,042.00
9 October 2023	Correspond with S. Kaul re: research assignment (0.1); call with same re: same (0.4); research re: arbitration issues (0.6).	A Padmanabhan	1.10	814.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
10 October 2023	Calls with J. Zakia (W&C) re: securities litigation issues (0.3) and Foxconn issues (0.1).	D Turetsky	0.40	700.00
10 October 2023	Review legal research re: Foxconn motion to dismiss (1.9); call with D. Turetsky re: securities litigation issues (0.3) and Foxconn issues (0.1).	J Zakia	2.30	4,025.00
10 October 2023	Review and analysis of motion to dismiss (1.2); review of research re: arbitration clause (0.8); outline response (0.9).	J Green	2.90	3,799.00
10 October 2023	Confer with J. Zakia re: DiamondPeak indemnification obligations (0.5); email M. Winograd (Brown Rudnick) re: indemnification (0.2); analyze Debtors' documents and communications re: Foxconn (1.2); review research re: Foxconn arbitration clause from A. Padmanabhan (0.3); call with A. Padmanabhan re: same (0.4); finalize analysis re: motion to compel arbitration (0.8) and memorandum re: same (1.0); draft email to J. Green re: same (0.6).	S Kaul	5.00	5,300.00
10 October 2023	Research re: Foxconn arbitration issues (5.4); call with S. Kaul re: same (0.4).	A Padmanabhan	5.80	4,292.00
11 October 2023	Review letter from derivative securities claimants (0.2); further analysis re: securities litigation issues (0.3); emails to J. Zakia (W&C) and R. Kampfner (W&C) re: securities litigation issues (0.3); calls with J. Zakia (W&C) re: securities litigation issues (0.6); review letter from D&O insurance carrier (0.1) and email to R. Gorsich (W&C) re: same (0.1).	D Turetsky	1.60	2,800.00
11 October 2023	Calls with Equity Committee re: resolution of securities fraud claims, confer with client re: same (0.9); confer with D. Turetsky re: litigation strategy (0.6); prepare for and participate in SEC call, confer with client and co-counsel re: same (1.0).	J Zakia	2.50	4,375.00
11 October 2023	Review and analysis of motion to dismiss (1.1); outline response (0.7); finalize stipulation re: scheduling (0.3).	J Green	2.10	2,751.00
11 October 2023	Draft certification of counsel for extension of dates (0.5); draft stipulation for same (1.0); draft proposed order for same (0.8).	A Padmanabhan	2.30	1,702.00
12 October 2023	Review letter from D&O insurer re: RIDE litigation (0.1); email to M. Leonard (Lordstown) re: same (0.1); call with J. Rotenberg (Katten) re: RIDE litigation issues (0.2); calls with J. Zakia (W&C) re: securities litigation issues (0.2).	D Turetsky	0.60	1,050.00
12 October 2023	Review directors' proofs of claim (0.3); confer with directors' counsel re: same (0.5); review legal research re: Foxconn motion to dismiss (1.6).	J Zakia	2.40	4,200.00
12 October 2023	Review and analysis of case law and record re: motion to dismiss (1.5); outline response (1.8); finalize stipulation re: scheduling (0.2).	J Green	3.50	4,585.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
12 October 2023	Further research in connection with issues concerning Foxconn motion to dismiss.	A Padmanabhan	0.60	444.00
13 October 2023	Call with J. Altman (Katten) re: RIDE litigation issues.	D Turetsky	0.10	175.00
13 October 2023	Review and analysis of case law and record re: motion to dismiss (0.8); outline response (1.1).	J Green	1.90	2,489.00
13 October 2023	Call with A. Padmanabhan re: damage estimates re: securities class actions (0.2); analysis re: same (0.2).	R Szuba	0.40	456.00
13 October 2023	Call with R. Szuba re: damage estimates (0.2); research relevant materials re: same (2.7).	A Padmanabhan	2.90	2,146.00
14 October 2023	Draft and revise response to Burns letter re: asset sales (1.3); confer with Winston re: investigation status (0.3).	J Zakia	1.60	2,800.00
14 October 2023	Draft response to motion to dismiss.	J Green	1.50	1,965.00
15 October 2023	Call with J. Zakia (W&C) re: Labaton litigation issues.	D Turetsky	0.20	350.00
15 October 2023	Draft response to motion to dismiss.	J Green	1.90	2,489.00
16 October 2023	Calls with J. Zakia (W&C) re: DiamondPeak litigation issues (0.2) and Ohio securities litigation issues (0.3).	D Turetsky	0.50	875.00
16 October 2023	Confer with director's counsel re: potential DiamondPeak settlement status.	J Zakia	0.30	525.00
16 October 2023	Draft response to motion to dismiss.	J Green	2.10	2,751.00
17 October 2023	Call with J. Zakia (W&C) re: securities litigation issues.	D Turetsky	0.10	175.00
17 October 2023	Participate in call with Baker Hostetler re: document retention (0.5); confer with D. Turetsky re: litigation strategy (0.3); confer with S. Peiken and client re: SEC claims (0.5); follow up with client re: same (0.6); witness preparation meeting with R. Hamilton and D. Turetsky (0.3).	J Zakia	2.20	3,850.00
17 October 2023	Draft response to motion to dismiss.	J Green	1.90	2,489.00
18 October 2023	Confer with counsel for directors re: indemnification claims.	J Zakia	0.40	700.00
18 October 2023	Draft response to motion to dismiss.	J Green	2.80	3,668.00
19 October 2023	Calls with J. Zakia (W&C) re: Foxconn issues.	D Turetsky	0.20	350.00
19 October 2023	Draft response to motion to dismiss (1.5); review of record and authorities in connection therewith (3.6).	J Green	5.10	6,681.00
20 October 2023	Calls with J. Zakia (W&C) re: securities litigation issues (0.5); call with S. Vasser (Dechert) re: DiamondPeak	D Turetsky	1.10	1,925.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	issues (0.4); further analysis re: securities litigation issues (0.2).			
20 October 2023	Call with directors' counsel re: settlements.	J Zakia	0.50	875.00
20 October 2023	Draft response to motion to dismiss (1.4); review of record and authorities in connection therewith (2.5).	J Green	3.90	5,109.00
21 October 2023	Call with J. Zakia (W&C) re: securities litigation issues (0.8); calls with D. Ninivaggi (Lordstown) re: securities litigation issues (0.3).	D Turetsky	1.10	1,925.00
21 October 2023	Analysis re: response to motion to dismiss (0.8); review of record and authorities in connection therewith (0.9).	J Green	1.70	2,227.00
22 October 2023	Call with Dechert (A. Levander, S. Vasser), D. Ninivaggi (Lordstown), D. Hamamoto (Lordstown) and J. Zakia (W&C) re: DiamondPeak litigation issues (0.5); calls with J. Zakia (W&C) re: securities litigation issues (0.3); further analysis re: director indemnification claims (0.2).	D Turetsky	1.00	1,750.00
22 October 2023	Call with counsel for securities plaintiffs re: potential resolution (0.4); call with counsel for directors re: settlements (0.5).	J Zakia	0.90	1,575.00
22 October 2023	Analysis re: response to motion to dismiss (0.4); review of record and authorities in connection therewith (0.7).	J Green	1.10	1,441.00
22 October 2023	Review prior insurance schedules for putative class actions (0.3); email with W&C team re: same (0.1).	A Padmanabhan	0.40	296.00
23 October 2023	Calls with Winston re: investigation status.	J Zakia	0.20	350.00
23 October 2023	Analysis re: response to motion to dismiss (0.8); review of record and authorities in connection therewith (0.5).	J Green	1.30	1,703.00
24 October 2023	Call with J. Zakia (W&C) re: Foxconn issues (0.1); further analysis re: Foxconn issues (0.2).	D Turetsky	0.30	525.00
24 October 2023	Draft response to motion to dismiss (1.2); review of record and authorities in connection therewith (0.7).	J Green	1.90	2,489.00
25 October 2023	Call with B. Silverberg (Brown Rudnick) re: Foxconn issues.	D Turetsky	0.20	350.00
25 October 2023	Draft response to motion to dismiss (4.5); review of record and authorities in connection therewith (1.2).	J Green	5.70	7,467.00
26 October 2023	Draft response to motion to dismiss (9.2); review of record and authorities in connection therewith (2.7).	J Green	11.90	15,589.00
27 October 2023	Review class action settlement proposal, confer with	J Zakia	1.40	2,450.00

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	opposing counsel re: same (0.4); confer with client re: same (0.5); confer with counsel for directors (0.5).			
27 October 2023	Review and analysis re: response to motion to dismiss.	J Green	1.70	2,227.00
30 October 2023	Call with J. Zakia (W&C) re: securities settlement issues (0.1); call with D. Ninivaggi (Lordstown) re: securities settlement issues (0.4).	D Turetsky	0.50	875.00
30 October 2023	Review and revise opposition to Foxconn motion to dismiss (2.3); prepare for and participate in call with insurers re: potential settlement (0.8); confer with directors' counsel re: settlement (0.4); confer with client re: settlement and litigation strategy (0.7).	J Zakia	4.20	7,350.00
30 October 2023	Revise response to motion to dismiss (3.8); review and analysis of record and case law in connection therewith (2.3).	J Green	6.10	7,991.00
30 October 2023	Review proofs of claim (0.5); create chart re: same (1.0).	A Padmanabhan	1.50	1,110.00
31 October 2023	Call with J. Zakia (W&C) re: securities settlement issues.	D Turetsky	0.10	175.00
31 October 2023	Confer with directors' counsel re: settlement status (0.4); multiple client calls re: settlement status and litigation strategy (0.8); prepare for and participate in call with insurers re: settlement (0.6); review comments re: motion to dismiss opposition (0.5); confer with Equity Committee counsel re: settlement (0.3).	J Zakia	2.60	4,550.00
31 October 2023	Review and analysis re: response to motion to dismiss.	J Green	2.40	3,144.00
31 October 2023	Create chart of all proofs of claim against Debtors of securities litigation (1.8); research re: claim objections (4.5).	A Padmanabhan	6.30	4,662.00
<b>SUBTOTAL: Litigation</b>			<b>174.90</b>	<b>233,896.00</b>

### Professional Retention & Fees – W&C

4 October 2023	Review parties in interest list re: retention/conflict matters.	P Strom	0.90	864.00
4 October 2023	Update list of potentially interested parties (0.1); emails with P. Strom, S. Ludovici and F. He re: same (0.1).	D Hirshorn	0.20	76.00
5 October 2023	Draft second monthly fee application.	P Strom	3.10	2,976.00
5 October 2023	Prepare supplemental list of potential interested parties for S. Ludovici (0.3); update W&C connections tracker for S. Ludovici (0.3).	D Hirshorn	0.60	228.00
8 October 2023	Review and comment re: second W&C monthly fee	D Turetsky	0.60	1,050.00

**WHITE & CASE**

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	application.			
9 October 2023	Review and revise second monthly fee application.	P Strom	0.40	384.00
9 October 2023	Review and respond to email from S. Ludovici re: potential party in interest.	D Hirshorn	0.20	76.00
10 October 2023	Draft supplemental Turetsky declaration re: W&C retention.	P Strom	0.90	864.00
12 October 2023	Review and comment re: second monthly (August) fee application (0.2); review and comment re: supplemental declaration in support of W&C retention (0.2).	D Turetsky	0.40	700.00
13 October 2023	Review pro forma time entries for fee application for privilege and confidentiality.	P Strom	2.30	2,208.00
19 October 2023	Review and comment re: August fee application.	D Turetsky	0.30	525.00
31 October 2023	Prepare September fee application.	P Strom	1.10	1,056.00
<b>SUBTOTAL: Professional Retention &amp; Fees – W&amp;C</b>			<b>11.00</b>	<b>11,007.00</b>

**Professional Retention & Fees – Other**

2 October 2023	Emails to D. Kovsky (Troutman) re: Winston retention application.	D Turetsky	0.10	175.00
2 October 2023	Draft Winston and Strawn retention order (0.2); correspond with Committees re: same (0.1); correspond with J. Zakia and W&C team re: same (0.1).	R Szuba	0.40	456.00
10 October 2023	Correspond with various estate professionals re: supplemental conflict checks.	P Strom	0.40	384.00
20 October 2023	Email to M. Leonard (Lordstown) and S. Ludovici (W&C) re: ordinary course professional payment issues.	D Turetsky	0.10	175.00
30 October 2023	Review draft retention application of WBD as Debtors' co-counsel.	D Kim	0.10	127.00
<b>SUBTOTAL: Professional Retention &amp; Fees – Other</b>			<b>1.10</b>	<b>1,317.00</b>

**Reports, Schedules & U.S. Trustee Issues**

18 October 2023	Review of 8-K and comments from Baker.	G Pryor	1.20	2,340.00
18 October 2023	Draft 8-K re: bankruptcy court approval of sale (1.6); correspond with F. He re: same (0.1); correspond to D. Turetsky and W&C team re: same (0.4); correspond to A. Kroll and company re: same (0.3).	R Szuba	2.40	2,736.00



**WHITE & CASE**

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
19 October 2023	Further review and comment re: 8-K re: LAS sale.	D Turetsky	0.10	175.00
22 October 2023	Review 8-K re: amended Plan and related correspondence.	G Pryor	0.60	1,170.00
22 October 2023	Review and comment re: Plan 8-K (0.5); emails to F. He (W&C) re: Plan 8-K (0.1).	D Turetsky	0.60	1,050.00
22 October 2023	Draft and revise 8K for Plan filing.	F He	1.50	1,965.00
23 October 2023	Review of revised 8-K re: sale.	G Pryor	0.50	975.00
23 October 2023	Confer with J. Spreen (Baker) re: 8K for Plan filing (0.2); confer with A. Ericksen re: same and revise 8K (0.6); confer with A. Kroll (Company) re: edits to 8K (0.3); confer with R. Szuba re: same (0.3).	F He	1.40	1,834.00
26 October 2023	Review draft 8-K disclosure re: closing.	G Pryor	0.50	975.00
26 October 2023	Review and revise 8-K for sale closing (0.3); confer with J. Spreen (Baker) re: same (0.2); confer with A. Kroll re: same (0.2).	F He	0.70	917.00
27 October 2023	Confer with buyer on 8-K for sale closing.	F He	0.30	393.00
30 October 2023	Review of 8-K and 10-Q re: closing.	G Pryor	1.50	2,925.00
30 October 2023	Draft and revise 8-K for Disclosure Statement hearing (0.8); confer with J. Spreen (Baker) re: same (0.2); review and revise 10-Q for company (1.5); confer with D. Kim re: same (0.3).	F He	2.80	3,668.00
30 October 2023	Review and provide bankruptcy-related comments and changes to draft 10-Q (0.9); confer with F. He re: same (0.1); review audit letter results (0.2).	D Kim	1.20	1,524.00
31 October 2023	Review FRI and A. Ericksen's comments on 10-Q re: closing.	G Pryor	0.50	975.00
31 October 2023	Review and revise 10-Q for company.	F He	1.20	1,572.00
31 October 2023	Further review and provide comments to bankruptcy-related provisions of draft 10-Q (0.4); review audit letter (0.1); correspond with L. Mezei for preparation of same to same (0.1).	D Kim	0.60	762.00

<b>SUBTOTAL: Reports, Schedules &amp; U.S. Trustee Issues</b>	<b>17.60</b>	<b>25,956.00</b>
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**Tax Issues**

6 October 2023	Call with A. Kroll (Lordstown) and R. Kampfner (W&C) re: NOL issues.	D Turetsky	0.40	700.00
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<b>SUBTOTAL: Tax Issues</b>	<b>0.40</b>	<b>700.00</b>
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LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
<b>Employee Issues</b>				
18 October 2023	Research re: employee severance issue and confer with D. Turetsky re: same.	F He	0.60	786.00
19 October 2023	Further analysis re: employee issues.	D Turetsky	0.20	350.00
20 October 2023	Call with M. Leonard (Lordstown) re: employee issues (0.1); further analysis re: employee issues (0.1).	D Turetsky	0.20	350.00
23 October 2023	Email to A. Kroll (Lordstown) re: employee severance issues (0.1); email to T. Marnin (W&C) re: employee severance issues (0.1).	D Turetsky	0.20	350.00
24 October 2023	Call with J. Zakia (W&C) re: employee severance issues (0.2); review employee employment agreement (0.2); call with D. Detweiler (Womble) re: employee severance issues (0.1); call with M. Patterson (Womble) re: employee issues (0.2); calls with D. Ninivaggi (Lordstown) re: employee issues (0.6); call with B. Silverberg (Brown Rudnick) re: employee issues (0.3); call with D. Kovsky (Troutman) re: employee issues (0.1); emails to F. He (W&C) re: employee severance issues (0.1); further analysis re: employee issues (0.2).	D Turetsky	2.00	3,500.00
24 October 2023	Confer with F. He re: severance issue (0.1); research re: same (0.5); draft analysis re: same (0.2).	R Szuba	0.80	912.00
25 October 2023	Email to R. Szuba (W&C), F. He (W&C) and D. Kim (W&C) re: employee severance issues (0.2); further analysis re: employee severance issues (0.1); further analysis re: employee severance issues (0.1); call with D. Kovsky (Troutman) re: employee issues (0.2); call with D. Ninivaggi (Lordstown) re: employee issues (0.2); call with T. Marnin (W&C) re: employee issues (0.2); draft proposal to Committees re: employee claims (0.8); email to D. Kovsky (Troutman) and F. Lawall (Troutman) re: employee issues (0.1); email to R. Stark (Brown Rudnick) and B. Silverberg (Brown Rudnick) re: employee issues (0.1).	D Turetsky	2.00	3,500.00
25 October 2023	Confer with D. Turetsky re: resolving employee dispute issues and research re: same (0.6); draft motion re: same (1.8).	F He	2.40	3,144.00
25 October 2023	Research re: treatment of allowance of employee claim re: special employee pay motion (0.5); correspond to F. He re: same (0.2).	R Szuba	0.70	798.00
25 October 2023	Draft employee settlement motion (1.7); research re: issues concerning same (3.3).	L Mezei	5.00	5,100.00
26 October 2023	Email to F. He (W&C) re: employee severance issues (0.2); call with B. Silverberg (Brown Rudnick), R. Wining (M3) and R. Kampfner (W&C) re: employee issues (0.7); call with R. Kampfner (W&C) re: employee issues (0.2); email to D. Ninivaggi (Lordstown) re: employee claim issues (0.1); emails to	D Turetsky	1.30	2,275.00

**WHITE & CASE**

LORDSTOWN MOTORS CORP.

RE: Project Pickup

OUR REF: 1902563-0002

DATE	DESCRIPTION	TIMEKEEPER	HOURS	USD
	D. Ninivaggi (Lordstown) re: employee issues (0.1).			
26 October 2023	Attend call with Equity Committee re: employee issues.	R Kampfner	1.10	1,749.00
26 October 2023	Research (2.1) and draft motion re: employee settlement matters (2.6); confer with L. Mezei re: research re: same (0.4).	F He	5.10	6,681.00
26 October 2023	Review draft motion re: employee settlements (0.4); correspond with F. He re: same (0.1).	D Kim	0.50	635.00
26 October 2023	Research re: employee settlement motion (1.7); revise re: same (1.2).	L Mezei	2.90	2,958.00
27 October 2023	Call with D. Ninivaggi (Lordstown) re: employee matters (0.3); email to D. Kovsky (Troutman) and F. Lawall (Troutman) re: employee matters (0.1).	D Turetsky	0.40	700.00
28 October 2023	Revise and draft motion re: employee/settlement claim issues.	F He	0.80	1,048.00
31 October 2023	Review and revise Debtors' employee claim 9019 motion (0.6); correspond with F. He re: same (0.2).	D Kim	0.80	1,016.00
<b>SUBTOTAL: Employee Issues</b>			<b>27.00</b>	<b>35,852.00</b>
<b>TOTAL</b>			<b>1,228.40</b>	<b>1,654,153.00</b>